

**FINAL ADDENDUM
TO THE DRAFT EIR**

**OAKLAND CITY
ADMINISTRATION BUILDING
Environmental Impact Report**


February 1995

ER No. 92-7

State Clearinghouse No. 93091065

Prepared for:
City of Oakland





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Prepared for:
City of Oakland

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File No. ER92-7
Ref. No. _____

City of Oakland
Oakland, California

FINAL ENVIRONMENTAL IMPACT REPORT FOR:

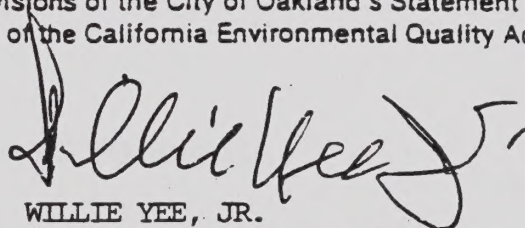
Oakland City Administration Building

(Project Title)

California Environmental Quality Act

CERTIFICATION OF COMPLIANCE WITH THE
CALIFORNIA ENVIRONMENTAL QUALITY ACT

The Director of City Planning finds that the attached Final Environmental Impact Report has been completed in compliance with the California Environmental Quality Act, the Guidelines prescribed by the Secretary for Resources, and the provisions of the City of Oakland's Statement of Objectives, Criteria and Procedures for Implementation of the California Environmental Quality Act.



WILLIE YEE, JR.

Acting Director of City Planning

DATE:

ACCEPTANCE OF FINAL REPORT BY CITY PLANNING COMMISSION

The attached Final Environmental Impact Report was accepted by the Oakland City Planning Commission at its meeting of _____.

MARIA BANICO, Secretary
City Planning Commission

**OAKLAND CITY ADMINISTRATION BUILDING
FINAL ENVIRONMENTAL IMPACT REPORT ADDENDUM**

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I. INTRODUCTION

A. CEQA PROCESS

On July 8, 1994, the City of Oakland Planning Department (Lead Agency) released for public review a Draft Environmental Impact Report (Draft EIR or DEIR) on the proposed City Administration Building (EIR 92-7, SCH No. 93091065). The public review and comment period on the DEIR began on July 8, 1994 and closed on August 29, 1994, which is greater than the 45 days required. The City Planning Commission held a public hearing on the Draft EIR/EIS on August 24, 1994.

The Draft EIR for the City Administration Building, together with this Addendum constitute the Final EIR for the proposed project. The Final EIR is an information document prepared by the Lead Agency (City of Oakland Planning Department) that must be considered by decision makers (including the Oakland City Planning Commission) before approving or denying a proposed project. California Environmental Quality Act (CEQA) Guidelines (Section 15132) specify the following:

"The Final EIR shall consist of:

- (a) The Draft EIR or a revision of the draft.
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the Lead Agency."

This document has been prepared pursuant to CEQA Guidelines. This Final EIR Addendum incorporates comments from public agencies and the general public, and contains appropriate responses by the Lead Agency to those comments.

B. NEPA PROCESS: FEDERAL ACTION WITHDRAWN

The Draft EIR noted above was also published as a Draft Environmental Impact Statement (Draft EIS or DEIS), pursuant to the National Environmental Policy Act (NEPA). The federal Lead Agency was the Federal Emergency Management Agency (FEMA). At the time the Draft EIR/EIS was published, FEMA was to pay about \$3.55 million of the cost of the City Administration Building as a replacement for the former City Hall Annex at 1417 Clay Street, and the California Office of Emergency Services was to pay an additional approximately \$1.18 million. City Hall Annex had been damaged in the 1989 Loma Prieta Earthquake and the City and FEMA jointly determined that the building was so badly damaged that repair would not be economically feasible. City Hall Annex was demolished in 1993.

Subsequent to publication of the Draft EIR/EIS, FEMA, on October 13, 1994, informed the City in writing that the "federal undertaking" was limited to Repair/Replacement of the original City Hall Annex at 1417 Clay Street. (The FEMA letter is included in the Appendix of this Final EIR Addendum.) Because FEMA involvement with the City Administration Building project was terminated, no federal or state disaster recovery funds will be forthcoming for construction of the City Administration Building. Accordingly, this document is being published as a Final EIR addendum alone, and no Final EIS will be published, as there is no federal undertaking or any federal approval action for which environmental review must be completed.

Had there been federal funding for a portion of the project cost, as was initially anticipated, FEMA also would have been required, like all federal agencies, to comply with Section 106 of the National Historic Preservation Act of 1966. Section 106 requires a federal agency head with jurisdiction over a federal, federally assisted, or federally licensed undertaking to take into account the effect of the agency's undertakings on properties included in or eligible for the National Register of Historic Places. Under the Section 106 process, FEMA would have made a determination about project effects on historic properties and would have sought concurrence from the State Historic Preservation Officer and, potentially, consulted with the Advisory Council on Historic Preservation.

Because FEMA involvement with the project has terminated, FEMA has no responsibility for compliance with either NEPA or Section 106, and the Section 106 process will not occur. The Section 106 consultation process would have afforded interested parties an additional opportunity to comment on the proposed project's effect on historic resources. Because that opportunity was not available as previously anticipated, the City provided an additional 15-day period, ending

November 18, 1994, during which the City would accept comments on the Draft EIR. The City notified recipients of the DEIR/DEIS and potentially interested parties, including the State Historic Preservation Officer, of this opportunity to submit additional comments. (The City's letter advising recipients of the additional comment period is included in the Appendix of this Final EIR Addendum.) Responses to additional comments received during this period are included in this Final EIR Addendum.

C. METHOD OF ORGANIZATION

This Final EIR Addendum for the proposed City Administration Building contains information in response to concerns raised during the public comment periods.

Following this introductory Chapter I, Chapter II of this document contains text changes to the Draft EIR/EIS, reflecting necessary additions and corrections addressed by the public comments or responses to comments, or initiated by Planning Department staff to correct the Draft EIR/EIS text. Chapter II begins with analysis of Alternative 1A, Reduced Program. Text changes, beginning on p. 15 of this document, appear in order of page number in the Draft EIR/EIS on which the change is made. Where a text change is made as part of a response to a public comment, the comment number is noted. Revised figures follow the text changes, except for revised Figure 2, which appears on p. 11 in the discussion of Alternative 1A.

Chapter III contains a list of all persons and organizations who submitted written comments on the Draft EIR/EIS and/or who testified at the public hearing held on August 24, 1994.

Chapter IV contains copies of written comments received during the initial comment period and responses to those comments. Each letter of comment is designated alphabetically; each comment is numbered in the margin of the comment letter, and the responses to all of the comments in a particular letter follow that letter. In some cases, the response refers to another response to a similar comment; the comments are referenced alphanumerically by letter and comment number, as in "the response to Comment A-2" (meaning the response to the second comment in letter A). The Table of Contents lists persons or organizations submitting written comments individually. Where a response includes a change to the text of the Draft EIR/EIS, a reference is made to Chapter II.B, Addenda to the Draft EIR/EIS, where text changes, beginning on p. 15 of this document, are listed in order of page number in the Draft EIR/EIS.

Chapter V similarly contains a summary of the August 24, 1994, public hearing on the Draft EIR/EIS, along with responses to comments on the Draft EIR/EIS that were made at the hearing. The responses follow the hearing summary. Where these comments are referred to elsewhere in the document, they are identified as if they were contained in a Comment letter K, as in "the response to Comment K-4." Where a response includes a change to the text of the Draft EIR/EIS, a reference is made to Chapter II.B, Addenda to the Draft EIR/EIS, where text changes, beginning on p. 15 of this document, are listed in order of page number in the Draft EIR/EIS.

Chapter VI includes comments received during the additional 15-day comment period described in Section I.B., above, along with responses to those comments. Where a response includes a change to the text of the Draft EIR/EIS, a reference is made to Chapter II.B, Addenda to the Draft EIR/EIS, where text changes, beginning on p. 15 of this document, are listed in order of page number in the Draft EIR/EIS.

Pages in this document, including comment letters and the hearing summary, are numbered sequentially. For ease of reference, page numbers in Sections IV, V, and VI also indicate the letter of comment to which the responses are directed (i.e., "Responses - A"), at the bottom of each page of responses text.

D. SUMMARY OF KEY ISSUES

This Final EIR Addendum includes six key issues, one of which relates to the City's program for the City Administration Building and the remaining five of which were raised by commenters. This brief summary of those issues is presented for the reader's information and includes the location in this document where a more thorough discussion of each issue is found. The reader is cautioned that, with the exception of the information on the reduced building program, this summary is based on responses to comments on the Draft EIR/EIS, and therefore may lack some context. The reader should note the reference to the place in this Final EIR Addendum where the complete response to comment may be found, and should refer to the complete response, and to the comment that generated the response, for a fuller explanation of the material contained in this summary.

Reduced Building Program. The City's program for the City Administration Building has been reduced in size since publication of the Draft EIR/EIS, and now includes a proposal for 328,000 net square feet (nsf) of office space, compared to the program requirement of 355,000 nsf of office space analyzed in the Draft EIR/EIS. (The amount of retail space proposed

would be reduced by about 2,000 nsf, to about 39,000 nsf.) Accordingly, this Final EIR Addendum includes Alternative 1A, which is the City's current preferred project. Alternative 1A is a modified version of Alternative 1 that would result in no new or more substantial impacts than would Alternative 1. It is presented in this document in a format similar to that employed for all other "build" alternatives in Chapter IV of the Draft EIR/EIS, including a description and a summary of the impacts. As is noted in that impacts summary, the impacts of Alternative 1A are fully analyzed in the impacts assessment of Alternative 1 in Chapter VI of the Draft EIR/EIS. Therefore, inclusion of Alternative 1A in this Final EIR Addendum does not require recirculation of the Draft EIR. (See the discussion of the Reduced Program on p. 9 of this Final EIR Addendum for further information.)

Preservation of Historic Buildings on the Alternative Project Sites. A number of commenters on the Draft EIR/EIS suggested that the City further analyze an additional alternative that would contemplate development of the project by reusing existing buildings ("Existing Buildings on Taldan and Dalziel Blocks").

In preparing an EIR, a lead agency is not required to analyze every conceivable alternative that is raised in public comments. Instead, an EIR must analyze a range of reasonable alternatives that could feasibly attain most of the basic objectives of the project and also might reduce the project's significant environmental effects (CEQA *Guidelines* Sec. 15126(d)).

The Draft EIR/EIS for the City Administration Building project considers a reasonable range of alternatives. To develop a list of possible alternatives for analysis in the Draft EIR/EIS, the City considered information that it had on various possible sites from the Advisory Committee that was convened by the City Manager's Office, as well as information based upon discussions with the EIR consultant, and the Federal Emergency Management Agency (FEMA), which was then the lead agency for federal environmental review (see Chapter I.B, p. 2 of this Final EIR Addendum). In addition, the City considered comments received in response to the public "scoping" session and the Notice of Preparation on the Draft EIR. A total of seven alternatives were analyzed in detail and four other alternatives not selected for further study were also discussed in the Draft EIR/EIS, including the Existing Buildings on Taldan and Dalziel Blocks.

The discussion in the Draft EIR/EIS on the Existing Buildings on Taldan and Dalziel Blocks Alternative was detailed enough to provide a summary of its environmental impacts and reach the conclusion that it was an "environmentally superior" alternative because it would avoid the significant unavoidable impacts on architectural resources, visual quality and urban design of all

"build" alternatives considered in Chapter VI of the Draft EIR/EIS. However, this alternative also would present sufficient operational problems such that it would not substantially achieve the project objectives. The discussion in the Draft EIR/EIS also provided a list of reasons why this Existing Buildings on Taldan and Dalziel Blocks Alternative was not feasible to pursue. Therefore, the discussion was in and of itself sufficient to provide the decision-makers with the environmental advantages and disadvantages of all the alternatives analyzed in the EIR. No further discussion of the Existing Buildings on Taldan and Dalziel Blocks Alternative is legally required by CEQA.

However, in response to public comments and for the purpose of clarification and amplification of the discussion already contained in the Draft EIR/EIS, additional information on the Existing Buildings on Taldan and Dalziel Blocks Alternative is presented in this Final EIR Addendum. (This presentation does not constitute new, significant information requiring recirculation under CEQA). Please see p. 20 of this Final EIR Addendum for revised text on the Existing Buildings on Taldan and Dalziel Blocks Alternative. (See also the response to Comment A-1 on p. 49 of this Final EIR Addendum for more information on this alternative; see the next entry in this summary for more information on City actions to reduce effects on the Downtown District.)

Downtown Incentive Package. Several commenters on the Draft EIR/EIS noted that, since the project would require the demolition of several existing buildings, the City should take steps to mitigate the project's impact on the Downtown Historic District. In response to these concerns, City staff has met extensively with representatives of local historic preservation groups.

As a result of these discussions, City staff and local preservationists have jointly developed a proposed package of historic preservation incentives. The incentives package was carefully designed to promote both historic preservation and economic revitalization, in a way that remains sensitive to the City's limited staff and funding. The package would include seven elements: Nomination of District to the National Register of Historic Places; creation by the City of a targeted Revolving Loan Fund; creation of a Facade Improvement Program; creation of a Mills Act Contract Program; creation of a historic preservation component in business attraction/retention efforts; City staff coordination and use of qualified consultants in historic preservation efforts; and promotion and marketing of the incentives package. (See Chapter II.B, Addenda to the Draft EIR/EIS, for new Mitigation Measure HIST-5d, Downtown District preservation incentives, which is added to p. 295 of the Draft EIR, and Mitigation Measure HIST-6b, Rotunda Building rehabilitation, which is added to p. 296. Please see also the response to Comment N-1 on p. 144 of this Final EIR Addendum.)

Bookstores and Artists on the Dalziel Block. The Pardee Building, on the Dalziel block, contains the most substantial concentration of used book dealers in Oakland and thus can be seen as a small but unique feature of Oakland's economic and cultural life. Although the City has arranged for the book dealers to move back to the Dalziel block once the City Administration Building were constructed, it is possible that one or more of the book dealers in the Pardee Building would suffer financial hardship or be financially unable to survive temporary relocation resulting from the project and/or relocation back to the Dalziel block. However, based on the significance criteria used in the Draft EIR/EIS, the loss of the antiquarian booksellers in the Pardee Building, while a potential matter of concern for the decision-makers, and certainly of vital importance to store owners and some customers, would not constitute a significant effect on the environment. It also should be noted that, as stated in the Draft EIR/EIS, the Pardee Building has historically been occupied by a variety of retail and office tenants, and that a large portion of the ground floor was occupied by a retail fabrics store until the 1980s; the first book store moved into the building in 1977. Artists have been present in the building from the 1960s. Based on the same significance criteria, the potential dislocation of these artists, while also of concern to decision-makers, the artists themselves, and others, would not constitute a significant effect on the environment. The Pardee Building's importance as an historical and cultural resource derives from its link to the Downtown District, a City-designated historic district that is described in the Draft EIR/EIS beginning on p. 98, and not from the current bookstore and artists' uses that occupy the building. (See the response to Comment C-1 on p. 60 of this Final EIR Addendum for further information.)

Project Objectives. The Draft EIR/EIS analyzes environmental effects of the project alternatives, but does not analyze operational differences between alternatives. That comparison was included in the review of various alternatives conducted by the Advisory Committee, made up of Oakland citizens and City staff, during 1992. City staff and consultants have evaluated operational characteristics of various alternatives, all of which are judged against the same project objectives that are summarized in the Draft EIR/EIS. The City Council, as the City decision-making body, will have the responsibility for comparing alternatives both on environmental and operational grounds and selecting one alternative (including, potentially, the No-Project Alternative) for approval. (See the response to Comment D-2 on p. 66 of this Final EIR Addendum for further information.)

Proposed State Office Building. The proposed State Office Building is discussed in the Draft EIR/EIS, which acknowledges that the State Office Building is planned for the same site as Alternative 3. The proposed State Office Building is specifically included in Chapter VI of the

Draft EIR/EIS in the cumulative analysis of issues related to building massing and intensity of development, including wind, architectural resources, visual quality and urban design, fire protection, and transportation and parking, as well as in the land use analysis. Because the analyses of air quality and noise are largely derived from traffic impacts, the proposed State Office Building also is accounted for in those cumulative analyses. The proposed State Office Building is not specifically included in the discussion of site-specific issues such as geology, hydrology, or hazardous materials, although the location was studied for Alternative 3. The proposed State Office Building was not included in the shadow analysis for the City Administration Building because shadow effects are not additive in the same sense as wind or transportation. It should be noted that the City and the State have not yet signed an agreement regarding disposition of the site for the proposed State Office Building. Although environmental review of the State Office Building is under way, no project has yet been approved. Finally, the City Advisory Committee that studied alternatives for the City Administration Building project in 1992 considered the City Hall West-Miller Building (Alternative 3) site in its deliberations. (See the response to Comment K-2 on p. 130 of this Final EIR Addendum for further information. See Revised Figure 2, p. 11, for the location of the proposed State Office Building.)

Other Issues. In addition to the above, the loading analysis in the Draft EIR/EIS has been modified to include the potential for Taldan Block loading activity to occur in a widened Kahn's Alley, and the parking analysis in the Draft EIR/EIS has been revised to account for visitor parking demand and existing on-site parking that would be eliminated. The revised analyses do not result in any new significant effects. (See p. 36 of this Final EIR Addendum for further information on loading and p. 33 for further information on parking.)

II. ADDENDA TO THE DRAFT EIR/EIS

A. REDUCED PROGRAM (ALTERNATIVE 1A)

The City's program for the City Administration Building has been reduced in size since publication of the Draft EIR/EIS, and now proposes 328,000 net square feet (nsf) of office space, compared to the program requirement of 355,000 nsf of office space analyzed in the Draft EIR/EIS. (The amount of retail space proposed would be reduced by about 2,000 nsf, to about 39,000 nsf.) Accordingly, this Final EIR Addendum includes Alternative 1A, which is the City's current preferred project. Alternative 1A is a modified version of Alternative 1 that would result in no new or more substantial impacts than would Alternative 1. It is presented here in a format similar to that employed for all other "build" alternatives in Chapter IV of the Draft EIR/EIS, including a description and a summary of the impacts. A revised Table 1 summarizes the comparison between Alternative 1A and the other alternatives analyzed in the Draft EIR/EIS. As is noted in the impacts summary, the impacts of Alternative 1A are fully analyzed in the impacts assessment of Alternative 1 in Chapter VI of the Draft EIR/EIS. Alternative 1A is not "considerably different" from the other "build" alternatives analyzed in the Draft EIR/EIS. Therefore, inclusion of Alternative 1A in this Final EIR Addendum does not require recirculation of the Draft EIR.

DESCRIPTION

This alternative would develop the City Administration Building project on two sites: the Taldan Block and the Dalziel block (see revised Figure 2). The combined floor area of the two buildings would total approximately 328,000 net square feet (nsf) of office space, which is 27,000 nsf less than Alternative 1, and about 39,000 nsf of retail space, which is 2,000 nsf less than Alternative 1. The approximately 7.5 percent reduction in program square footage of Alternative 1A, compared to Alternative 1, is primarily the result of a change in the program such that the approximately 115 Police Department employees formerly scheduled to move from 455 7th Street to the new City Administration Building are no longer included in the program. With Alternative 1A, City employment in the project buildout year (1997) would be approximately 1,010 at the City Administration Building, of which approximately 790 currently work in the City Center area, about 155 are currently in office space outside the immediate area,

TABLE 1: SUMMARY OF CITY ADMINISTRATION BUILDING ALTERNATIVES (REVISED)

	Height /a/	Sq. Footage /b/	Parking /c/	Empl. /d/
Alternative 1				
Taldan Block and Dalziel Block		O-355,000 sq.ft.	235 spaces	1,125/335
Taldan Block	8+1 / 112 ft.	R-41,000 sq.ft./f/	beneath	
Dalziel Block /e/	7+2 / 98 ft.		Dalziel block	
Alternative 1A (Preferred Alternative)				
Taldan Block and Dalziel Block		O-328,000 sq.ft.	235 spaces	1,010/220
Taldan Block /g/	8+1 / 112 ft.	R-39,000 sq.ft./f/	beneath	
Dalziel Block /e,g/	7+2 / 98 ft.		Dalziel block	
Alternative 2				
Dalziel Block /e/	11+2 / 154 ft.	O-355,000 sq.ft.	235 spaces	1,125/335
		R-21,000 sq.ft./f/	beneath	
			Dalziel block	
Alternative 3				
City Hall West / Miller Federal Building Site	9+1 / 126 ft.	O-355,000 sq.ft.	250 spaces:	1,125/335
		R-None	Miller block	
Alternative 4				
Taldan Block / Rotunda Building		O-355,000 sq.ft.	Existing	1,125/335
Taldan Block	8+1 / 112 ft.	R-40,500 sq.ft./f/	lots/garages	
Rotunda Building	6+1 / 120 ft.			
Alternative 5				
Taldan Block / Wells Fargo Bldg.		O-320,000 sq.ft.	Existing	1,015/225
Taldan Block	8+1 / 112 ft.	R-37,700 sq.ft./f/	lots/garages	
Wells Fargo Building	10 / 105 ft.			
Alternative 6				
Taldan Block / Dalziel Block / Clay Street Garage		O-355,000 sq.ft.	160 spaces	1,125/335
Taldan Block	8+1 / 112 ft.	R-20,000 sq.ft./f/	beneath	
Dalziel Block	7+2 / 94.5 ft.		Dalziel block	
Clay Street Garage	5+1 / 67.5 ft.		and Clay St. garage	
Alternative 7				
No Project	n/a	n/a	n/a	

/a/ Height in Stories (above + below ground) / Feet, for each building.

/b/ Net square feet (nsf). (Gross square feet = nsf + 0.81). (KEY: O - office; R - retail)

/c/ About half of the parking would be for City employees / City pool vehicles and about half for the public.

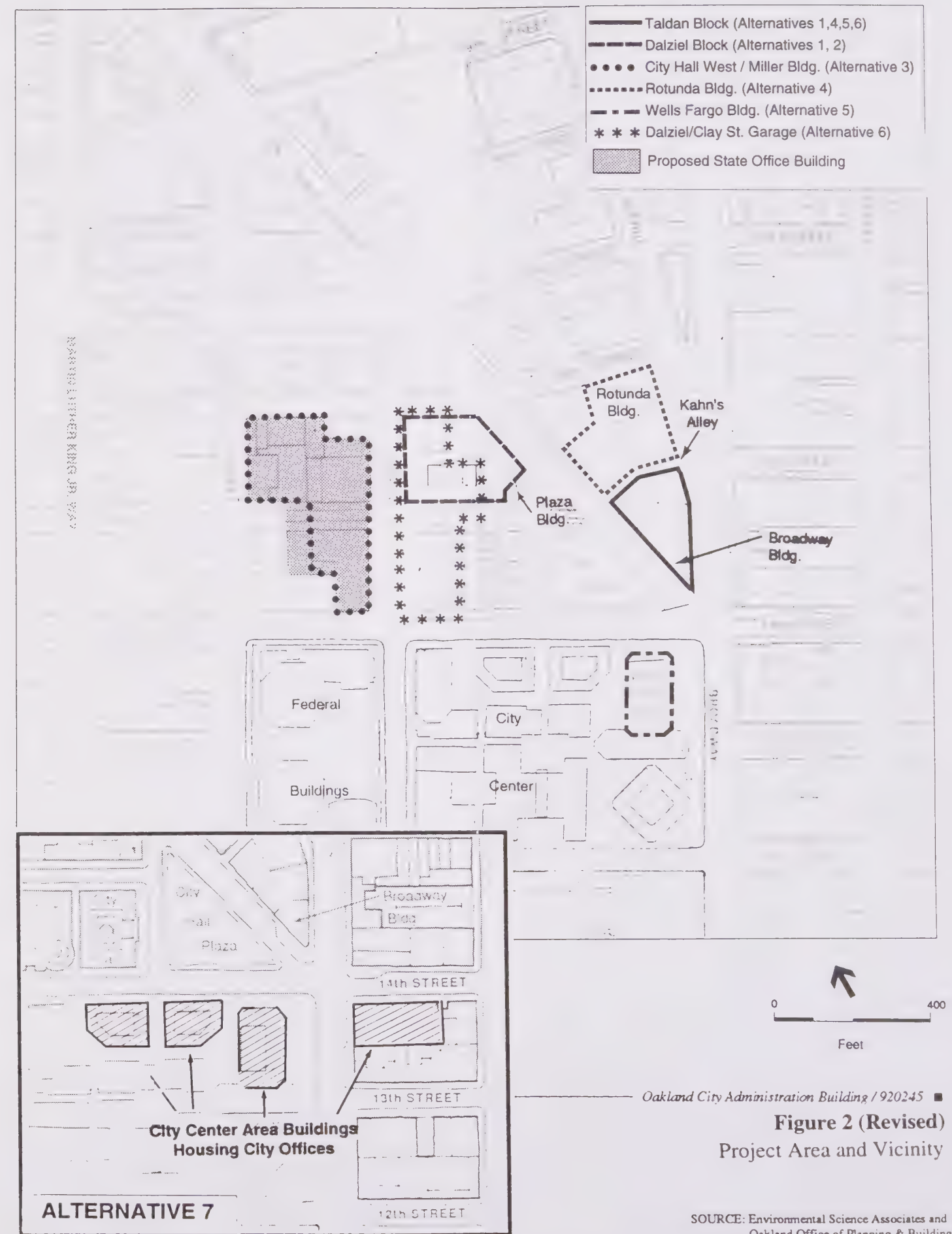
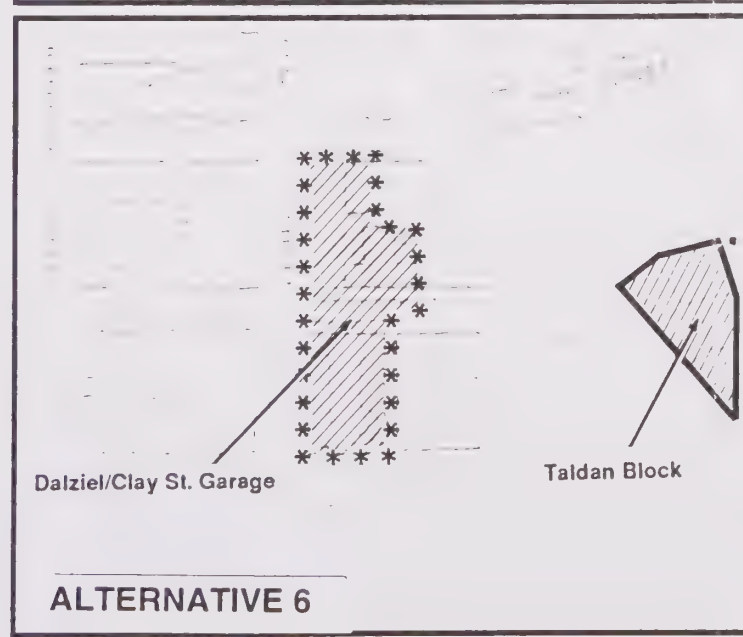
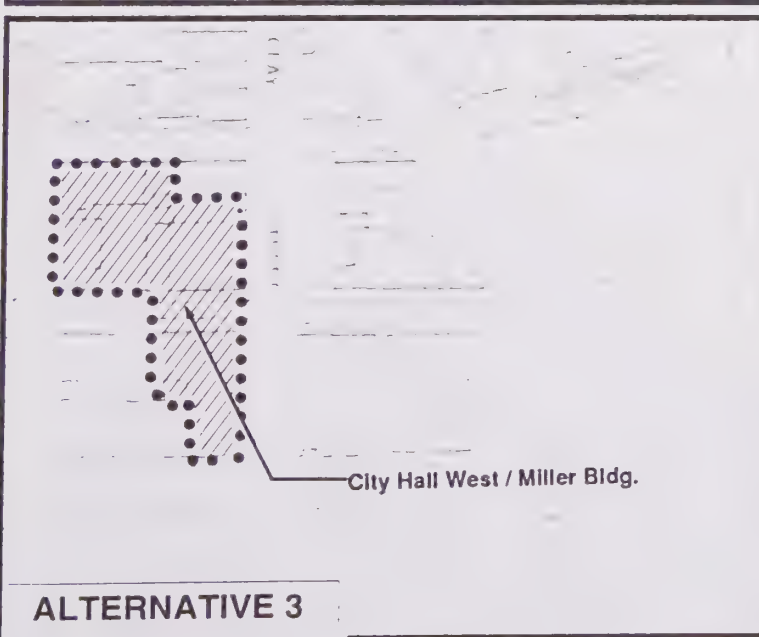
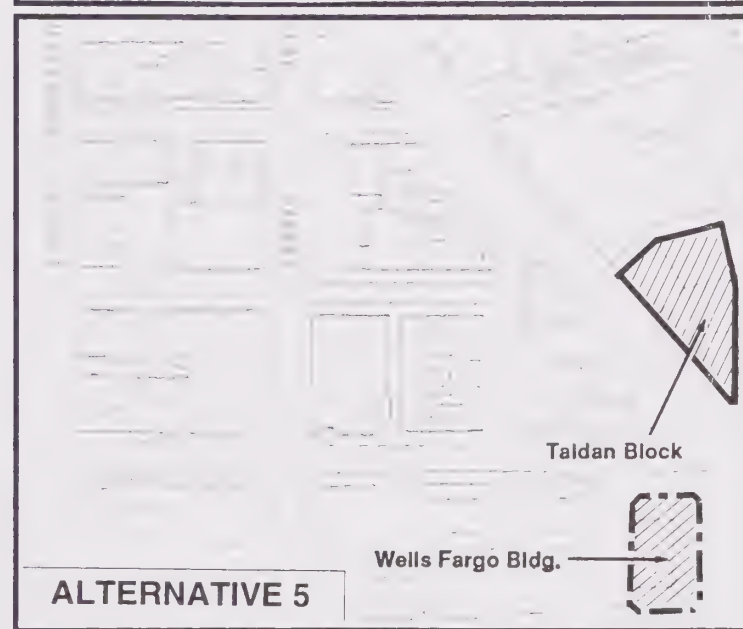
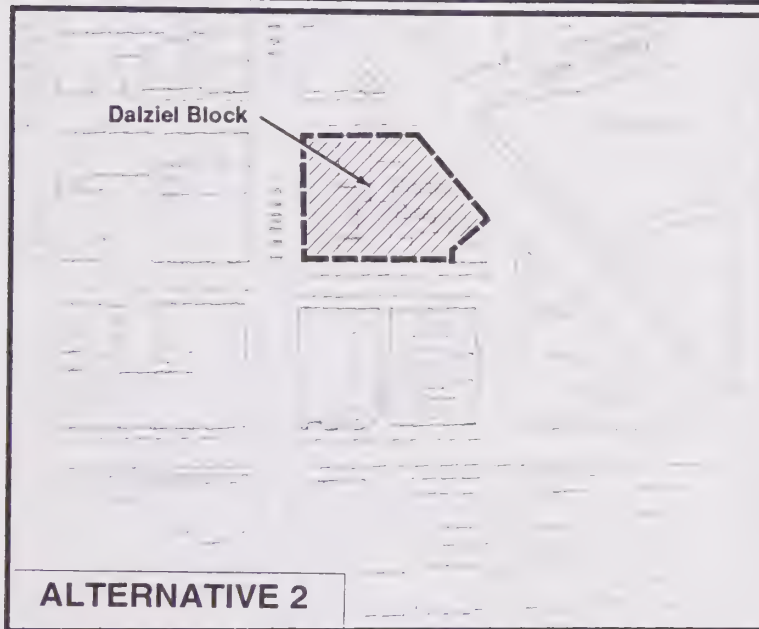
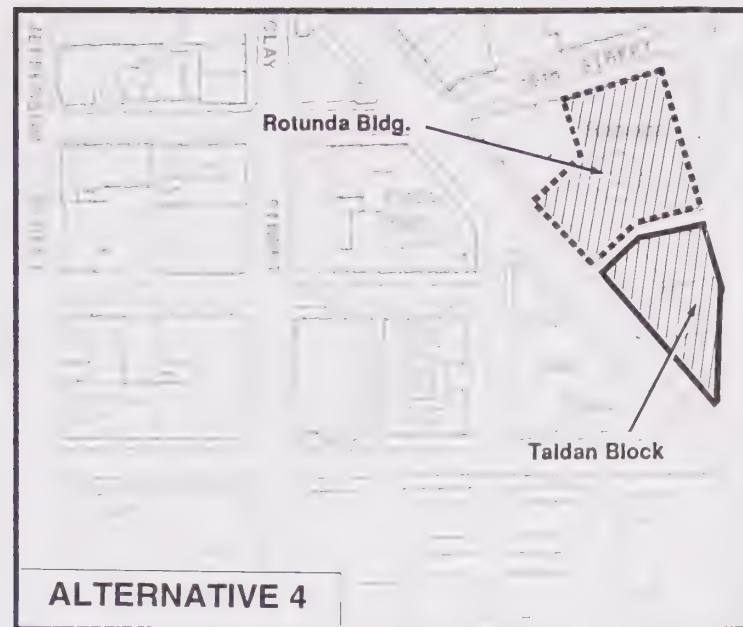
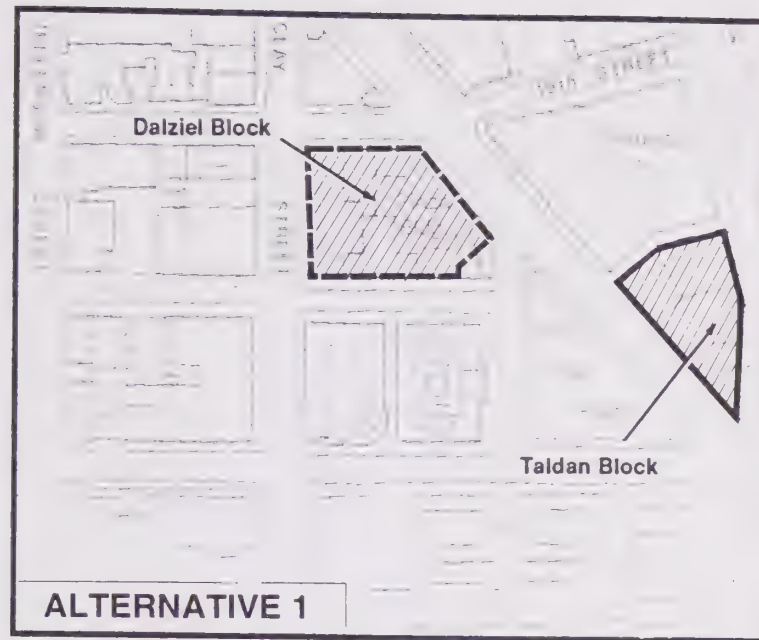
/d/ Total city employment / Net new city employment in project area vicinity.

/e/ Does not include Plaza Building, which would be retained as a separate structure.

/f/ Retail space includes 21,000 nsf (20,000 nsf with Alternative 1A) on Dalziel Block (one-half net new, and excluding Plaza Building, which would retain existing retail); 20,000 nsf (19,000 nsf with Alternative 1A) on Taldan Block (all net new); 20,500 nsf in Rotunda Building (all net new); 17,700 nsf (existing) in Wells Fargo Building. (Net new retail based on retail uses extant in July 1993, when traffic counts were performed.)

/g/ Maximum height; each new building would have only a partial upper story.

SOURCE: Oakland Office of Planning and Building; SGS Group / Morgan Associates; Carey & Co.



and about 65 would be newly hired. For purposes of analysis, the 220 employees not currently in the project area vicinity would be considered net new; this would be about 34 percent fewer net new employees than with Alternative 1.

As with Alternative 1, the Taldan Block structure would be two buildings: a new structure and the existing historic Broadway Building at the triangular corner of Broadway and San Pablo Avenue. The Broadway Building would be renovated, including life-safety, electrical, and mechanical upgrading, and seismic reinforcement. (Repair of earthquake-caused structural and cosmetic damage would be undertaken in advance of the project to protect passers-by and to prevent further deterioration of the building.) Portions of the Broadway Building interior could be retained as at present, with restoration to repair damage. Also like Alternative 1, three existing earthquake-damaged and closed buildings between the Broadway Building and Kahn's Alley would be demolished and replaced with a new structure, which would be connected to the floor plates of the Broadway Building. In this manner, the floor plates of the combined structure would be large enough for City administrative use (approximately 20,000 sq. ft.). This new building would be seven stories, one story less than the Broadway Building, except for a small partial eighth floor immediately adjoining the Broadway Building. Corridors in the new building would be connected to those in the Broadway Building to allow for circulation within the two structures as if they were one. This method of construction would reduce the cost of rehabilitating the Broadway Building through the use of shared seismic reinforcement and building systems. Ground-floor retail space would be included on Broadway and San Pablo Avenue. The new structure would include one basement level, as does the Broadway Building. Compared to Alternative 1, the Taldan Block portion of this alternative would be the same except for the reduced height of the new structure and the associated reduction in square footage due to elimination of about one story.

The building on the Dalziel block would be six stories plus a partial seventh story, with two subsurface parking levels, and would include the entire block with the exception of the historic Plaza Building. (About one-half of the new building would be six stories, and the remainder would be seven stories.) Ground-floor retail space would be constructed on the San Pablo Avenue facade. The Plaza Building at the northwest corner of 15th Street and City Hall Plaza would be retained as a separate structure, not part of the City Administration Building. The other three existing buildings on the Dalziel block, one of which is earthquake-damaged and closed, would be demolished. Compared to Alternative 1, the Dalziel block portion of this alternative would be the same except for the partially reduced height of the new structure and the associated reduction in square footage due to elimination of about one-half story.

Other elements of this alternative would be similar to Alternative 1: parking would be in two underground levels for approximately 235 vehicles (the same as Alternative 1), about half for City employees and City pool vehicles and about half for the public, beneath the new building on the Dalziel block; access to the parking garage could be via Clay Street or 16th Street. Truck access for loading and deliveries for the Dalziel block building could be via Clay Street or, possibly, 16th Street, depending on the configuration of the building. For the Taldan Block building, truck access could be via Telegraph Avenue and a widened Kahn's Alley, with trucks exiting on San Pablo Avenue, or via a San Pablo Avenue cul-de-sac. (An underground loading dock beneath San Pablo Avenue, analyzed in the Draft EIR/EIS with Alternatives 1, 4, 5, and 6, is not now likely to be constructed because the cost would be prohibitive and because of potential adverse effects on the design of City Hall Plaza.) If truck loading were to occur on Kahn's Alley, it would be during limited hours, such as the early morning or late afternoon, and Kahn's Alley would be limited to pedestrian traffic at other hours. Street vacations (San Pablo Avenue, City Hall Plaza, and 15th Street) and expansion of City Hall Plaza would be as described in the Draft EIR/EIS for all "build" alternatives. As with Alternative 1, this alternative would widen Kahn's Alley to provide a more visible link between Broadway and City Hall Plaza.

With the reduced City Administration Building program, this alternative is the City's preferred alternative because it would best meet most of the City's program objectives as stated in Chapter III of the Draft EIR/EIS, including: improving interdepartmental communication; consolidating City offices near the historic City Hall; avoiding insofar as possible splitting City departments between floors of buildings or between buildings; minimizing duplication of administrative and support functions and building and mechanical systems; allowing physically convenient interdepartmental adjacencies; provision of a "one-stop" planning and building services center with a sufficiently large floor plate; encouraging economic redevelopment around City Hall; and renovating primary resource historic buildings.

IMPACTS

Effects of Alternative 1A would be similar to or somewhat less substantial than those of Alternative 1 described in the Draft EIR/EIS. The impacts related to the building "footprint" (building location and lot coverage), would be the same under Alternative 1A as those described for Alternative 1, as the location and lot coverage of Alternative 1A would be the same as with Alternative 1. This would include effects related to Geology, Soils and Seismicity; Surface Water, Hydrology and Water Quality; Hazardous Materials; Air Quality (except traffic-related); Noise (except traffic-related); Interior Environment; Land Use, Plans and Zoning; Architectural

Resources (effects related to demolition of existing buildings); Archaeology; and Transportation (Truck Access only). For Truck Access, if loading for the Taldan Block were via Kahn's Alley with trucks exiting onto San Pablo Avenue, potential truck-pedestrian conflicts could occur as stated in Impact TRUCK-1 on p. 368 of the Draft EIR/EIS (and as revised in Chapter II.B of this Final EIR Addendum), and could be mitigated by Mitigation Measure TRUCK-1a, which would ensure that truck loading would not occur during hours of peak pedestrian activity.

For impacts related to building massing, the differences between Alternatives 1A and 1 would be incremental. For purposes of environmental review, no change in impacts would occur since final design plans would not be completed until after the EIR is completed (see p. 7 of the Draft EIR/EIS). Therefore the impacts analyzed in the Draft EIR/EIS were at a conceptual level. This category of impacts includes Microclimate (Shadow and Wind); Architectural Resources (effects of new construction on the Downtown District); and Visual Quality and Urban Design. Because these impacts were analyzed without considering an actual building design, they would not change substantively as a result of the relatively minor change in project massing (approximately 7.5 percent decrease in building square footage and reduction in height of up to slightly less than one full story). Specifically, shadow and wind impacts were analyzed in Chapter VI based on conceptual massing studies for each project alternative, as stated on p. 221 and p. 263 of the Draft EIR/EIS. Those impacts were not found to be significant for Alternative 1 and, thus, would not be significant for Alternative 1A. Similarly, effects on visual quality and urban design were also analyzed in Chapter VI based on generalized building masses (see p. 303 and the note attached to each visual simulation in the Draft EIR/EIS). Because of the general nature of the visual simulations, Alternative 1A would result in an appearance similar to that of Alternative 1, which is presented in Figures 66, 72, 74, 76, and 79 of the Draft EIR/EIS. Impacts on visual quality and urban design related to demolition of existing structures and construction of new, larger structures also would be significant and unavoidable for Alternative 1A, as they would for Alternative 1. Regarding effects on historic resources, the demolition of buildings identified as contributory to the Downtown District and construction of new, non-contributory buildings was identified as a significant, unavoidable impact of Alternative 1 (see Impacts HIST-1 and HIST-5 in the Draft EIR/EIS). This impact also would occur under Alternative 1A and would be a significant, unavoidable impact.

For impacts related to intensity of development (Public Services and Utilities; Transportation and Parking (except Truck Access); and traffic-related Air Quality and Noise), Alternative 1A would have somewhat lesser impacts than those analyzed in Chapter VI in the Draft EIR/EIS for Alternative 1. None of those effects was found to be significant and unavoidable in Chapter VI,

and the reduced intensity of development would not affect the significance of any identified impacts.

B. CORRECTIONS AND TEXT CHANGES

The following corrections and changes are made to the Draft EIR/EIS and are incorporated as part of the Final EIR. Revised or new language is underlined (except where all of the text is an addition). Brackets ([]) indicate where text has been deleted.

Where a change is made as part of a response to a comment on the Draft EIR/EIS, the comment number is noted in brackets at the end of the text change. Where no comment number is given, the change is initiated by Office of Planning and Building staff.

Page S-8, the first full paragraph is revised as follows:

Included in this City Hall Plaza plan would be several street closures. San Pablo Avenue would be closed to through traffic south of 16th Street or south of 15th Street. [] San Pablo Avenue would provide pedestrian pick-up/drop-off access to the Dalziel Block, Taldan Block and Rotunda Building, and, possibly, loading access to the Taldan Block, either on the surface or via an underground loading dock. Alternatively, truck loading for the Taldan Block, at limited hours, would be via Telegraph Avenue and Kahn's Alley, with trucks exiting onto San Pablo Avenue. Fifteenth Street [] could be closed to public through traffic between Clay Street and City Hall Plaza, with limited parking available to the mayor and City Council. Alternatively, 15th Street would remain open between Clay Street and City Hall Plaza (the street) to provide access to a pedestrian drop-off area for the buildings fronting the Plaza. The half block of 15th Street immediately west of Clay Street [] would be closed to accommodate planned development on the City Hall West - Miller Building site (either the City Administration Building or potential future development). City Hall Plaza (the street) would be closed and would be included in the enlarged open space. In all cases, emergency vehicles would be permitted access to all buildings on the Plaza.

Page S-8, the fourth sentence of the last paragraph is revised, and a new sentence is then added, as follows:

The Broadway Building would be renovated, including [] life-safety, electrical, and mechanical upgrading, and seismic reinforcement. (Repair of earthquake-caused structural and cosmetic damage would be undertaken in advance of the project to protect passers-by and to prevent further deterioration of the building.)

Page S-11, the second line should refer to:

CEQA Guidelines Section 15126(d)(4), as revised July 8, 1994. [J-13a]

Page S-15, Mitigation Measure "HIST-1a" should be designated "HIST-1." [J-13b]

Page S-16, the following additional mitigation measure is added:

HIST-5d: To enhance the remainder of the Downtown District, the City shall adopt an Incentives Package prior to approval of the City Administration Building project.

Page S-16, Mitigation Measure VIS-1 should read:

See Mitigation Measures HIST-1, HIST-2, HIST-4, and HIST-5 in Section VI.D.1, Architectural Resources. [J-13c]

Page S-16, Mitigation Measure VIS-2 should read:

See Mitigation Measure HIST-5a, HIST-5b, and HIST-5c in Section VI.D.1, Architectural Resources. [J-13d]

Page S-17 through S-39, the table should be labeled "Table S-3" (as it is on pages S-15 and S-16).

Page S-18, Mitigation Measure GEO-4 is revised to read:

The project sponsor shall ensure that existing buildings that are to remain following construction of the project are evaluated by a qualified structural engineer prior to issuance of a building permit to determine if they meet current earthquake building standards according to the City's *Comprehensive Plan* and the current or adopted *Uniform Building Code*, Oakland Building Code, or applicable historic building code(s). [J-13w]

Page S-27, the second paragraph of Mitigation Measure HIST-3 should read:

See also Mitigation Measure HIST-5a, HIST-5b, and HIST-5c. [J-13e]

Page S-28, the first paired Impact HIST-4 and Mitigation Measure HIST-4 should be deleted. [J-4].

Page S-28, Mitigation Measure HIST-6 is changed to read "HIST-6a."

Page S-28, the following additional mitigation measure is added:

HIST-6b: If Alternative 4 (Taldan/Rotunda) is not selected, the City shall commit to an aggressive timeline for transforming the Rotunda into a premiere education and technology transfer center. Under this timeline, initial project construction would begin in mid-1996. The structural repairs, seismic strengthening, and improvements to common areas would be completed by December 1997.

Page S-35, Mitigation Measure SERV-2.1 is revised to read:

The design of the project buildings would be required to comply with the current or adopted Oakland Building Code and/or historic building code(s), as applicable,[] and the current or adopted Oakland Fire Code[]. [J-13w]

Page S-36, Mitigation Measure SERV-3.1 is revised to read:

None required by CEQA. However, the project would comply with state and local laws and ordinances requiring water conservation. In addition, feasible mitigation measures in the form of recommendations of the State Department of Water Resources for water conservation measures would, if implemented as part of the project, reduce demand for potable water. [L-1]

Page 9, Figure 2 is revised to indicate the location of the proposed State Office Building. (See p. 11 of this Final EIR Addendum) [K-2]

Page 11, the three indented paragraphs describing street closures are revised as follows:

San Pablo Avenue would be closed to through traffic, either south of 16th Street or south of 15th Street. [] A cul-de-sac or other turning area [] would provide pedestrian pick-up/drop-off access to the Dalziel Block, Taldan Block and Rotunda Building, and possibly loading access to the Taldan Block. A two-way ramp could be constructed on San Pablo Avenue south of 16th Street leading to an underground loading dock that would serve the Taldan Block; if the underground loading dock were not constructed, loading activity for the Taldan Block would be via the San Pablo Avenue cul-de-sac. Alternatively, truck loading for the Taldan Block would be via Telegraph Avenue and Kahn's Alley, with trucks exiting onto San Pablo Avenue. Under this plan, truck loading would be at limited hours, such as the early morning or late afternoon. [] Except for freight and passenger loading activity, San Pablo Avenue between 15th or 16th Street and 14th Street would become part of the expanded City Hall Plaza.

15th Street [] could be closed to public through traffic between Clay Street and City Hall Plaza (the street in front of City Hall), with limited parking available to the mayor and City

Council.^{2a} Alternatively, 15th Street would remain open between Clay Street and City Hall Plaza (the street) to provide access to a pedestrian drop-off area for the buildings fronting the Plaza. [] If 15th Street were closed signage and possibly decorative pavement would be used to close the street; official vehicles would be permitted to exit onto San Pablo Avenue. The half block of 15th Street immediately west of Clay Street [] would be closed to accommodate planned development on the City Hall West - Miller Building site (either the City Administration Building or potential future development).

City Hall Plaza (the street) would be closed and would be included in the enlarged plaza (square).

Page 12, the fourth sentence of the last paragraph is revised, and a new sentence is then added, as follows:

The Broadway Building would be renovated, including [] life-safety, electrical, and mechanical upgrading, and seismic reinforcement. (Repair of earthquake-caused structural and cosmetic damage would be undertaken in advance of the project to protect passers-by and to prevent further deterioration of the building.)

Page 13, the sixth sentence of the first paragraph is revised as follows:

For the Taldan Block building, truck access would be via San Pablo Avenue, either on the surface or, if it is constructed, via the underground loading dock beneath San Pablo Avenue, or via Telegraph Avenue, Kahn's Alley and San Pablo Avenue.

Page 16, the last sentence of the second full paragraph is revised as follows:

The increase in operational noise, largely due to redistributed vehicle traffic resulting from street closures as part of the City Hall Plaza renovation, would [] be significant and unmitigable []. [M-3]

Page 18, the last sentence of the second full paragraph is revised to read:

This alternative would result in a parking shortfall on-site; however, adequate parking exists nearby. [J-10]

Page 21, the last sentence of the first paragraph is revised to read:

This alternative would result in a parking shortfall on-site; however, adequate parking exists nearby. [J-10]

^{2a} The EIR traffic analysis conservatively assumes the closure of 15th Street between Clay Street and City Hall Plaza and the prohibition of through traffic via 15th Street. City Hall Plaza and San Pablo Avenue. The resulting redistribution of traffic with this closure would generate higher traffic volumes (and resulting traffic noise) on Clay Street than would otherwise occur if the 15th Street-San Pablo Avenue through route were available as an alternate.

Page 22, the 10th sentence of the first paragraph is revised as follows:

For the Taldan Block building, truck access would be via San Pablo Avenue, either on the surface or, if it is constructed, via the underground loading dock beneath San Pablo Avenue, or via Telegraph Avenue, Kahn's Alley and San Pablo Avenue.

Page 23, the last sentence of the second full paragraph is revised to read:

This alternative would result in a parking shortfall on-site; however, adequate parking exists nearby. [J-10]

Page 24, the fourth line of the second full paragraph should refer to:

CEQA Guidelines Section 15126(d)(4) (as revised July 8, 1994). [J-13a]

Page 25, the seventh sentence of the second paragraph is revised as follows:

Truck access for loading and deliveries for the Taldan Block building would be via San Pablo Avenue, either on the surface or, if it is constructed, via the underground loading dock beneath San Pablo Avenue, or via Telegraph Avenue, Kahn's Alley and San Pablo Avenue.

Page 27, the last sentence of the first paragraph is revised to read:

This alternative would result in a parking shortfall on-site; however, adequate parking exists nearby. [J-10]

Page 28, the fourth full sentence is revised as follows:

Truck access for loading and deliveries for the Taldan Block building would be via San Pablo Avenue, either on the surface or, if it is constructed, via the underground loading dock beneath San Pablo Avenue, or via Telegraph Avenue, Kahn's Alley and San Pablo Avenue.

Page 30, the second sentence in the last paragraph is revised to read:

This alternative would not preclude City purchase of one or more existing [] buildings for use as City offices.

Page 31, the second sentence in the first full paragraph is revised to read:

Existing buildings on the alternative project sites that are closed as a result of damage suffered in the 1989 earthquake would continue to deteriorate unless a maintenance / rehabilitation program were instituted by the City.

Pages 32-33, the "Existing Buildings on Taldan and Dalziel Blocks Alternative" is replaced with the following to clarify and amplify the discussion contained in the Draft EIR/EIS. (This presentation does not constitute new, significant information requiring recirculation of the Draft EIR under CEQA).

Existing Buildings on Taldan and Dalziel Blocks Alternative - This alternative would involve locating the City Administration Building program in seven existing buildings on the Taldan and Dalziel blocks, with the addition of new construction on the Dalziel block to achieve additional square footage. It would include rehabilitation of all buildings scheduled for demolition as part of Alternatives 1 and 1A, as well as rehabilitation of the Broadway Building, also proposed under Alternatives 1 and 1A. The "Existing Buildings on Taldan and Dalziel Blocks Alternative" also would include construction of one new building that would be located chiefly on the existing parking lot on the western portion of the Dalziel block, and would also occupy some of the light wells in the interior portions of the Dalziel block and would add additional stories above the MacLafferty Building. On the Taldan Block, the four existing buildings would be connected by creating openings between the Broadway and KCR Buildings and between the KCR, Woodward and Money Back Smith Buildings. On the Dalziel block, openings would be created between the Dalziel, Pardee and MacLafferty Buildings to allow for circulation between buildings. The overall location would be the same as that of Alternatives 1 and 1A.

It is assumed for this analysis that, including the proposed new construction, this alternative would accommodate the entire reduced City Administration Building office and retail program, as described in Alternative 1A (see Chapter II.A of this Final EIR Addendum). Because existing buildings would be retained, subject to seismic strengthening as would be required, this alternative would not include on-site subsurface parking beneath the Dalziel block, as would Alternatives 1 and 1A, nor would it include the underground loading dock that might be included with the "build" alternatives analyzed in Chapter VI.

This alternative was not considered by the Advisory Committee convened by the City Manager's Office, but was examined in response to public concern raised during the scoping process over potential loss of existing buildings.

This alternative would meet some of the City's objectives, as it would: expand City offices near City Hall; encourage economic redevelopment and remove blighted conditions around City Hall; maintain the architectural and visual prominence of City Hall; and rehabilitate the Broadway Building, a primary resource historic building. This alternative would result in extensive renovation and rehabilitation of several earthquake-damaged buildings, many of which are currently closed.

The use of existing buildings for the City Administration Building project would result in uneven floor plates between buildings, particularly on the Taldan Block, where each of the existing buildings has different floor-to-floor heights. If the four existing buildings on the Taldan Block were combined into a single structure, at least two floors of the renovated building would have four separate levels, with differences of several feet between the four sections. The differences would be compounded at higher floors. Wheelchair ramps would have to be installed (where feasible) to allow for circulation between the different levels; this would reduce the usable floor space and would reduce the quality of working conditions in the building. On the Dalziel block, the three existing buildings that would be incorporated into this alternative have the same or similar floor-to-ceiling heights in some instances. Some uneven floor levels would result, although the differences would be less pronounced as two of the three structures are less than three stories tall. (The new building that would be built on this block would match the floor levels of the existing Dalziel Building, the tallest structure on the block.) As with the Taldan Block, construction of wheelchair ramps and varying floor levels would result in a loss of space and poor pedestrian circulation.

This alternative would physically connect existing buildings by constructing openings between them. While these openings would allow circulation between buildings, they would not create the large floor plates that would be included with all "build" alternatives analyzed in Chapter VI, including Alternative 1A (see Chapter II.A of this Final EIR Addendum), because the existing exterior walls would remain with the exception of the new openings. Gross square footage per floor of the individual existing buildings on the Taldan Block range from about 6,000 gross square feet (gsf) for the Money Back Smith Building to about 11,000 gsf for the KCR Building, while on the Dalziel block, gross square footage per floor ranges from about 4,000 gsf for the MacLafferty Building to about 23,500 gsf for the Pardee Building. New construction on the Dalziel block would have a maximum gross square footage per floor of about 25,000 gsf on the upper six stories. In contrast, Alternatives 1 and 1A would develop gross square footage per floor of about 20,000 gsf on the Taldan Block and up to about 39,000 gsf on the Dalziel block. As noted in Chapter III, Purpose and Need, the City has determined that maximum efficiency of City office operations can be achieved if a City department can be located in its entirety on a single floor of the proposed City Administration Building. Floor plates of 36,000 to 42,000 gsf (about 29,000 to 34,000 net square feet [nsf]) would require that between four and seven departments be split between floors. By contrast, floor plates of 20,000 to 22,000 gsf (about 16,000 to 18,000 nsf) would likely require eight to 12 department splits. In addition, the City has determined that 30,000 to 40,000 gsf is required for the proposed one-stop permit center.

The remaining exterior walls of the existing buildings also would restrict the flexibility of City office space, making it difficult or impossible for departmental units to expand or contract over time. The interior configuration also would prevent the use of modular work spaces, which allow more efficient use of space and provide greater flexibility to reorganize work areas.

Fragmented floor plates also would impede building ventilation. To offset the loss of air flow, larger air ducts would be required, resulting in additional energy consumption.

The use of existing buildings would require seismic and other upgrades, including strengthening foundations, installing bracing frames, replacing some walls and brick work,

and reconstruction of interior finishes, windows and doorways. To comply with the Americans with Disabilities Act and applicable fire and building codes, building entries and elevator cores would have to be modified. Structural upgrading of the Broadway Building as a separate structure would be more complex and more expensive than with the project, which would integrate the floor plates of the Broadway Building with those of new construction on the Taldan Block. Structural upgrading of the Dalziel Building also would be complex due to extensive earthquake damage.

This alternative would result in inadequate floor-to-floor heights (space between floors) in at least portions of the remodeled buildings. Modern office space standards generally require floor-to-floor heights of at least 13 feet to accommodate sprinkler systems, air ducts, electrical and telephone wiring, water pipes and other systems that are located between ceilings and floors. On the Taldan Block, floor-to-floor heights would be similar to those of Alternatives 1 and 1A, which also would retain the Broadway Building, which has typical floor-to-floor heights of about 12½ feet. On the Dalziel block, the existing Dalziel Building has typical floor-to-floor heights of about 12 feet, while the Pardee Building has floor-to-floor heights of between 9½ and 13 feet. Installing new systems in the Dalziel Building and in the new building to be constructed on the parking lot could require that wiring, ducts, and piping be exposed and intrude within the office work space below.

This alternative thus would not meet three key City objectives of the program:

- It would not enhance interdepartmental communication between City Hall offices and those in the new buildings, as City departments would be separated between floors of buildings, and possibly dispersed over many buildings.
- It would not provide ready access to public services and a one-stop permit center on a single floor, as there would not be a large enough floor plate for the proposed on-stop center. Multiple building entrances might have to be used to reach different City offices.
- Finally, this alternative would not provide physically convenient interdepartmental adjacencies within the new buildings and avoidance of departmental splits and redundant support facilities.

With retention of the existing buildings on the Dalziel block, and with construction of a new building that would replace the existing parking lot on the Clay Street side of the block, adjoin the Dalziel Building on the west and north, and add stories to the MacLafferty Building, the revised "Existing Buildings on Taldan and Dalziel Blocks Alternative" would reduce effects on architectural resources and urban design to a less-than-significant level.

Other impacts related to building massing (shadow and wind) would be substantially less than those described in Chapter VI for all "build" alternatives; however, neither shadow nor wind was identified as significant, and neither effect of the revised "Existing Buildings on Taldan and Dalziel Blocks Alternative" would be significant.

Impacts related to building location and footprint would be similar to, or less substantial than, those identified in Chapter VI for Alternative 1 (which would be constructed on the

same site as the revised "Existing Buildings on Taldan and Dalziel Blocks Alternative"). For example, effects related to manufactured slopes, groundwater and subsurface contamination would be less substantial, since excavation would occur only to the extent required to improve existing building foundation and structural systems and to construct the new building on the Dalziel block, while effects related to soil stability and earthquake hazards would be the same as those identified in Chapter VI for existing older buildings. Land use impacts would be similar to those identified for Alternative 1, as tenants from the Pardee and MacLafferty Buildings would be relocated, as with all "build" alternatives.

Impacts related to intensity of development (Public Services and Utilities; Transportation and Parking; and traffic-generated Air Quality and Noise) generally would be less substantial than those described in Chapter VI for Alternative 1 because of the reduced building program; instead, such effects would be similar to those of Alternative 1A (Reduced Program), described in this Final EIR Addendum. Traffic-generated noise effects would be significant, as they would with all "build" alternatives analyzed in Chapter VI, largely as a result of redistribution of traffic due to the City Hall Plaza renovation component of the project, along with cumulative traffic increases. This alternative would provide no subsurface parking beneath the Dalziel block, as would Alternatives 1 and 1A. With no on-site parking, parking impacts would be similar to those described for Alternative 5 (with the loss of about 50 existing spaces on the Dalziel block), and would not be significant. This alternative would not include an underground loading dock beneath San Pablo Avenue, and thus would not require excavation around utilities as described in Impacts SERV-3.2, SERV-4.3, and SERV-6.2. Freight loading would occur at street level. For the Taldan Block, loading would be by hand truck from San Pablo Avenue north of 15th Street to the Woodward and the KCR Buildings, and for the Dalziel block, loading would be through a loading dock on the Clay or 16th Street sides of the Dalziel block. Conflicts between trucks and pedestrians could result, in the case of the Taldan Block, as described in Impact TRUCK-1, p. 368, but would be mitigable, as described in Mitigation Measures TRUCK-1a, 1b, and 1c (as revised in this Final EIR Addendum).

Of all alternatives considered in this report, only the "Existing Buildings on Taldan and Dalziel Blocks Alternative," which was withdrawn from detailed consideration because it is not a feasible alternative given the City's project objectives, would eliminate the significant unavoidable effects on architectural resources and on visual quality and urban design of all "build" alternatives. This alternative, therefore, is also considered an environmentally superior alternative.

Page 33, the following is added as a new third sentence of the last paragraph:

Also in the C-55/S-8 zone, a major conditional use permit would be required for City offices in the first 20 feet from the street, should any proposed City offices be so located. [J-13g]

Page 85, the first full sentence is revised to read:

Several small retail businesses occupy the northern half of the block, in the two-story-plus-mezzanine Pardee (Midgley) Building on San Pablo Avenue and 16th Street, and in the single-story MacLafferty Building on 16th Street. [J-13j]

Page 85, the third sentence of the first full paragraph is revised to read:

The former three-story building had served as City office space for about 10 years [J-13k]

Page 99, Figure 10 is revised to indicate that the Plaza Building is not within the project area. (Revised figures appear at the end of Chapter II of this Final EIR Addendum.) [J-13m]

Page 100, Figure 11 is revised to indicate that the Plaza Building is not within the project area. (Revised figures appear at the end of Chapter II of this Final EIR Addendum.) [J-13m]

Page 117, the second sentence of the first full paragraph is revised to read:

As it currently exists, the building is a three-story-plus-mezzanine, steel frame brick and stucco structure with terra cotta trim. [J-13h]

Page 117, the last sentence of the fourth full paragraph is revised to read:

The addition, which is six stories, of reinforced concrete, filled in the lower left corner of the "Y" at the intersection of 16th Street and Telegraph Avenue. [J-13o]

Page 122, the first sentence of the fourth paragraph is revised to read:

At one time occupied by an express agency, the building [] was recently in commercial use and has since become vacant. [J-13i]

Page 129, the second sentence is revised to read:

Foreshadowing later uses in the neighborhood, a second-hand book shop was located at 1239 Broadway (an address that was at the current site of the Rotunda Building prior to an adjustment of addresses in the early 20th century). [J-13p]

Page 139, the following is added to the end of the second paragraph:

Prior to the closure of Kahn's Alley due to earthquake damage in buildings on either side, City Hall was visible, beyond City Hall Plaza in the foreground, to pedestrians traveling west from Broadway as they rounded the corner in the Alley. [J-2]

Page 147, the fourth sentence of the fifth paragraph is revised to read:

I-980 and I-580 have a full interchange about one mile east of the 18th Street ramp. [J-13q]

Page 149, the first full sentence is revised to read:

I-980 transitions into SR-24 about one mile east of the 18th Street ramp. [J-13q]

Page 149, the second and third sentences of the first full paragraph is revised to read:

The easiest access to I-80 for project traffic is to enter I-980 eastbound at the 18th Street interchange. Project traffic can then exit to I-580 westbound which connects with I-80 approximately 1.8 miles to the west along I-580. [J-13q]

Page 154, the fourth sentence of the fourth paragraph is revised to read:

The District adopted a new TDM program on December 16, 1992, which went into effect for Alameda County on July 1, 1994. [J-13r]

Page 156, the fourth sentence of the third full paragraph is revised to read:

The total on-street parking capacity in the area studied is approximately 510 spaces. [J-10]

Page 159, Figure 23 is revised to correct the information regarding on-street parking supply provided in the Draft EIR/EIS. (Revised figures appear at the end of Chapter II of this Final EIR Addendum.) [J-10]

Page 160, the sixth sentence of the third paragraph is revised to read:

For example, during the p.m. peak hour the Daly City-to-Richmond route has a load factor of 1.36 between West Oakland and Embarcadero stations, and a load factor of 1.35 between the MacArthur and Ashby stations. [J-13t]

Page 161, Figure 24 is corrected to show additional bus stops not shown in the Draft EIR/EIS. (Revised figures appear at the end of Chapter II of this Final EIR Addendum.) [J-13u]

Page 164 (Table 16), the peak-hour headway (in minutes) for Lines 40 and 40L is revised to read:

12-15 [J-13v]

Page 174, Mitigation Measure GEO-4 is revised to read:

The project sponsor shall ensure that existing buildings that are to remain following construction of the project are evaluated by a qualified structural engineer prior to issuance of a building permit to determine if they meet current earthquake building standards according to the City's *Comprehensive Plan* and the current or adopted *Uniform Building Code, Oakland Building Code, or applicable historic building code(s)*. [J-13w]

Page 227 (Figure 33), the labels in the two diagrams are revised to refer to:

"Alternative 5" and "Alternative 6" [J-13x]

Page 283, Mitigation Measure "HIST-1a" should be designated "HIST-1." [J-13b]

Page 289, the first sentence of the third full paragraph is revised to read:

Alternative 3 would include demolition of the Alameda County Loan Association, Tucker, M. Stulsaft, and the Coakley Hotel Buildings, each of which is contributory, and would construct a nine-story building on the site formerly occupied by City Hall West and the Miller Federal Building. [O-2]

Page 291, the first full paragraph is revised to read:

With the earlier demolition of City Hall West, the Miller Federal Building, and other structures, removal of one contributory building[] as part of Alternative 4 would leave 28 of the original 35 contributors (and 35 of 43 original contributors and contingency contributors) identified west of Broadway / Telegraph Avenue. [O-2]

Page 292, the first full paragraph is revised to read:

With the earlier demolition of City Hall West, the Miller Federal Building, and other structures, removal of one contributory building[] as part of Alternative 5 would leave 28 of the original 35 contributors (and 35 of 43 original contributors and contingency contributors) identified west of Broadway / Telegraph Avenue. [O-2]

Page 293, the fourth full paragraph is revised to read:

With the earlier demolition of City Hall West, the Miller Federal Building, and other structures, removal of three contributory buildings as part of Alternative 6 would leave 26 of the original 35 contributors (and 33 of 43 original contributors and contingency contributors) identified west of Broadway / Telegraph Avenue. [O-2]

Page 295, the following additional mitigation measure is added:

HIST-5d: To enhance the remainder of the Downtown District, the City shall adopt an Incentives Package prior to approval of the City Administration Building project.

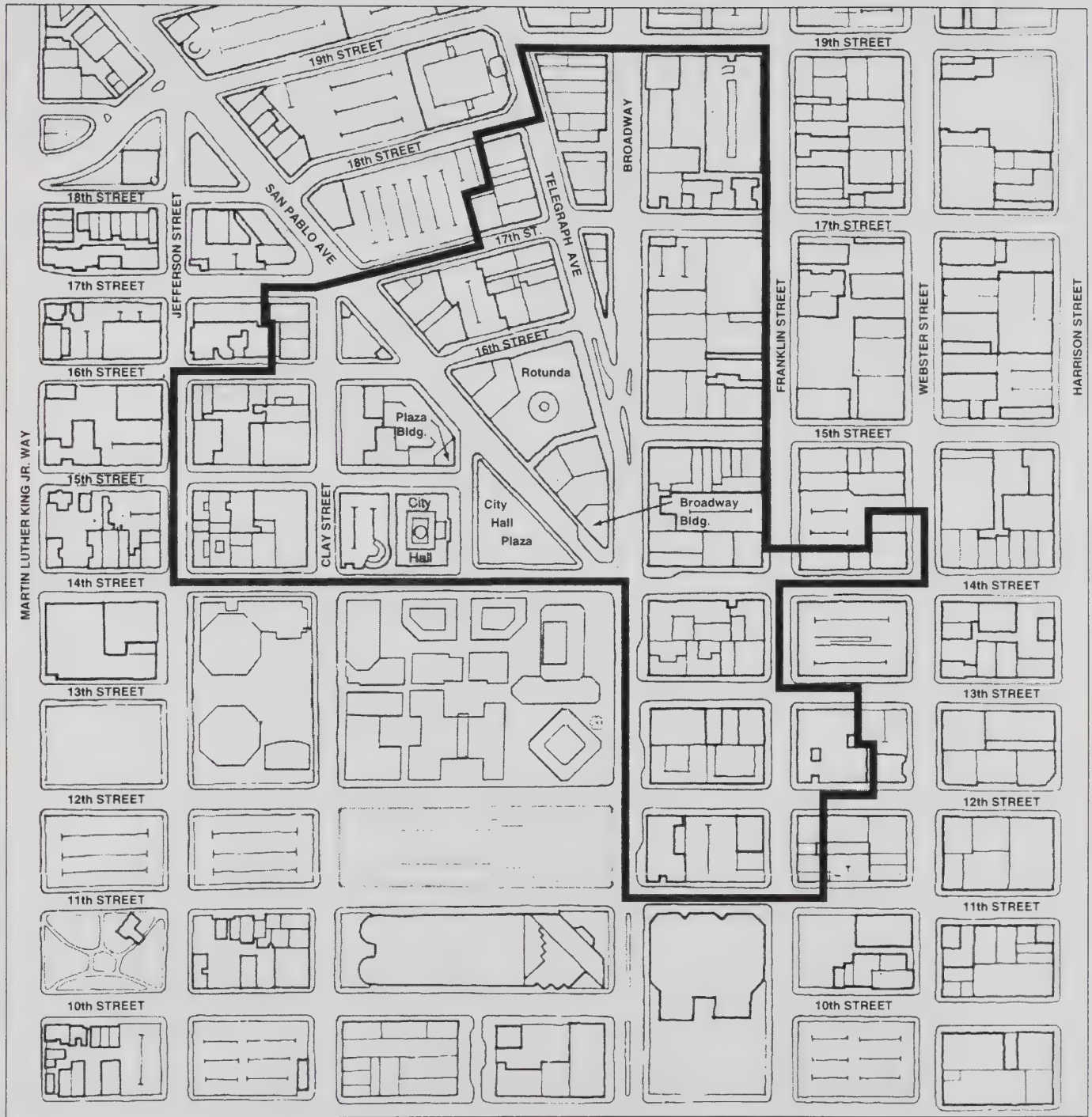
The incentive package would offer the following features:

- **Targeted Area:** The incentives would apply to a 16-block area centered around downtown Broadway (see Figure F-1). This area includes the entire Downtown Historic District, plus three blocks (bounded roughly by Telegraph, Franklin, 19th Street and 17th Street) that link the Historic District with the Emporium area.
- **Comprehensive Strategy:** The incentives would be developed in concert with current plans to improve the Broadway Corridor and to implement a Main Street program in Downtown Oakland. The program would have multiple facets that work as a whole.
- **Collaboration with Downtown Merchants and Building Owners:** The City (working with the business community, local preservationists, and others) would solicit input from building owners and merchants in the targeted area, in order to: (1) help tailor the incentives to their needs, and (2) help market the program after it is developed.
- **Partnership with Preservationists:** Under the proposed program, local preservationists would continue to donate time to help the City develop and implement the incentives package. In return, the City would expand its historic preservation efforts by offering financial incentives, improving staff coordination, and retaining consultants, as described below.

The proposed incentives would consist of seven elements.

1. Nomination of District to National Register

In order to make certain Federal tax credits and other incentives available to historic building owners, the City would nominate the Downtown Historic District to the National Register of Historic Places. To do this, the Office of Planning and Building (OPB) would supervise a qualified consultant who would research the impact of the City Administration Building on the integrity of the Downtown Historic District and, if appropriate, propose changes to the District boundaries. After any boundary adjustments were made, OPB would work with local preservationists to prepare and submit nomination documents.



SOURCE: Oakland City Manager's Office

— Oakland City Administration Building / 920245 ■

Figure F-1
Area Affected by Downtown Incentives Package

2. Revolving Loan Fund

Owners of historic buildings may need loans for seismic upgrades, rehabilitation, tenant improvements, or facade improvements. While most of these loans are best provided by the private sector, the Oakland Redevelopment Agency can play an important role in leveraging private funds. To do this, the Redevelopment Agency would continue to make available to building owners along Broadway the \$1.25 million revolving loan fund, which was established in 1994 as part of the Broadway Corridor Improvement Program. In addition to this fund, however, the Redevelopment agency would allocate \$200,000 to create an additional revolving loan fund to allow targeted assistance to buildings in the 16-block area described above. The \$200,000 loan fund would have the same broad policy guidelines and restrictions as the \$1.25 million Broadway Improvement loan fund. Should the \$200,000 fund become exhausted in the future, then the Office of Economic Development and Employment (OEDE) would: (1) set aside up to \$300,000 of the \$1.25 million Broadway Improvement loan fund to be dedicated for the 16-block area, (2) request up to \$300,000 of additional loan funds from the Redevelopment Agency, or (3) seek partnership arrangements with private lenders.

3. Facade Improvement Program

Within the 16-block area, OEDE would designate a high-profile, four- to six-block area that would be eligible for additional incentives aimed at facade improvement. OEDE would select the four- to six-block area based on the economic viability of the site, its potential to promote economic revitalization in the surrounding area, and the historic value and current condition of the building facades.

Several incentives would promote concentrated facade improvements in this four- to six-block area. First, in addition to the \$200,000 loan fund mentioned above, the Redevelopment Agency would create a separate \$200,000 revolving loan fund, with special favorable terms, dedicated solely to facade improvements in the four- to six-block area. Second, OEDE would retain a qualified outside consultant to develop appropriate design guidelines for facade improvement in the four- to six-block area. Third OEDE would work with the East Bay American Institute of Architects to explore the possibility of offering one hour of free counseling by a qualified preservation architect to building owners who are planning facade improvements but need design assistance. Finally, the City Council would waive the requirements for design review for buildings meeting certain criteria (to be developed by the Office of Planning and Building) in the four- to six-block area.

4. Mills Act Contract Program

As provided in the City's Historic Preservation Element, the City would continue its efforts to implement a Mills Act Program in the Downtown and/or in other parts of Oakland. It will take until mid-1996 for the City to study the desirability of a Mills Act program in the Downtown and to develop the full program.

5. Historic Preservation Component in Business Attraction/Retention Efforts

OEDE would incorporate historic preservation information into a new database that is being developed for business attraction and retention. The database will improve the City's

ability to keep track of spaces that are available in downtown buildings and which buildings potentially qualify for historic preservation incentives.

6. Staff Coordination and Qualified Consultants

To improve the City's accountability and coordination with respect to historic preservation, the City Manager's Office would convene an interdepartmental working group of all City staff involved in historic preservation. This group could serve as an arena where potential problems could be detected early on, monitored, and resolved in an efficient manner.

In addition to existing staff, the City would use Redevelopment Agency funds to retain qualified consultants in three areas. First, as mentioned above, OEDE would retain a consultant to help develop and market the facade improvement program for the four- to six-block demonstration area. The consultant(s) would assist the City in identifying the four- to six-block area, developing design guidelines, soliciting input from Downtown merchants and building owners, and developing and distributing promotional materials.

Second, OPB would retain a consultant for three years, on an as-needed basis, to coordinate preservation regulation compliance for the City. The consultant would provide technical assistance for analyses under Section 106 of the National Historic Preservation Act of 1966, environmental impact reports, or requests for proposals that involve historic preservation issues.

Third, the Office of Public Works Real Estate Division would retain a consultant for three years, on an as-needed basis, to expedite and oversee building management of City-owned historic buildings.

7. Promotion and Marketing of the Incentives Package

Using the interdepartmental group described above, the City would develop and implement a comprehensive marketing strategy for the incentives package.

First, local historic preservationists would assist the City in developing, producing, and distributing a series of promotional brochures. One brochure would feature the history of downtown and its landmarks and historic features, including information on walking tours. Other brochures could detail available federal, state, and local incentives programs, and these brochures could be used as a referral guide by both City staff and local building owners. The Office of Marketing and Public Information (OMPI) could take a leadership role in developing and printing the brochures, with assistance from the consultant referenced above.

Second, as described above, OEDE would highlight historic architecture as a distinctive selling point in its marketing brochures and its business attraction/retention efforts. OEDE also would describe available historic preservation incentive programs to existing businesses and businesses potentially interested in relocating to the Downtown Historic District.

Third, OMPI would work with Oakland Heritage Alliance, the Chamber of Commerce, Oakland Marketing Board, Oakland Development Council, Association of Realtors,

Oakland Convention Center, and others to integrate historic preservation into tourism strategies and other economic attraction efforts. For example, OMPI could contact the television media to arrange a special feature program highlighting historic treasures of Downtown Oakland.

Finally, the Office of Parks and Recreation Cultural Arts Division would continue to make sure local history is celebrated as part of the Public Art Master Plan through the current use of staff and consultants. [A-2, B-3, N-1]

Page 296, Mitigation Measure HIST-6 is changed to read "HIST-6a."

Page 296, the following additional mitigation measure is added:

HIST-6b: If Alternative 4 (Taldan/Rotunda) is not selected, the City shall commit to an aggressive timeline for transforming the Rotunda into a premiere education and technology transfer center. Under this timeline, initial project construction would begin in mid-1996. The structural repairs, seismic strengthening, and improvements to common areas would be completed by December 1997. [A-2, B-3, N-1]

Page 296, the last paragraph before subsection "2. ARCHAEOLOGY" is revised as follows:

Implementation of the above mitigation measures would reduce the impact of deterioration of existing historic buildings to a less-than-significant level.

Page 305, the first full paragraph should read:

... the City Administration Building would result in a shift in the emphasis of the northwestern portion of the Downtown District away from early 20th century commercial buildings towards newer government and private office buildings. [J-13aa]

Page 314 and 316, the caption for Figures 72 and 74 should read:

Visual Simulation - Alternatives 1 (Taldan Property only), 4, [] 5, and 6 (Taldan Property only) [J-2]

Page 331, the following is added as a new paragraph at the end of the page:

Widening of Kahn's Alley, as part of construction on the Taldan Block, could diminish the focusing effect of the Alley on the view of City Hall for pedestrians walking west from Broadway. [J-2]

Page 335, Mitigation Measure SERV-2.1 is revised to read:

The design of the project buildings would be required to comply with the current or adopted Oakland Building Code and/or historic building code(s), as applicable,[] and the current or adopted Oakland Fire Code[]. [J-13w]

Page 337, Mitigation Measure SERV-3.1 is revised to read:

None required by CEQA. However, the project would comply with state and local laws and ordinances requiring water conservation. In addition, feasible mitigation measures in the form of recommendations of the State Department of Water Resources for water conservation measures would, if implemented as part of the project, reduce demand for potable water. [L-1]

Page 351, the second and fourth lines of the tabular text should read:

- 1997 baseline + 6 Project Alternatives
- 2000 baseline + 6 Project Alternatives [J-13cc]

Page 352, the first sentence of the last paragraph should read:

The following provides a summary of the trip generation projected for each of the six project "build" alternatives based on trip rates from *Trip Generation*, Fifth Edition, published by the Institute of Transportation Engineers (ITE, 1991). [J-13cc]

Page 354, the third sentence is revised to read:

The use of a 35 percent factor to convert the employee person trip rate to a vehicle trip rate is conservative given existing data indicating that approximately 40 percent of all City employees in the City Center area travel to work by transit, carpool passenger or another method that does not generate a vehicle trip [] . . . [J-9]

Page 355, Note b to Table 28 is revised to read:

A 5 percent reduction is applied to the employee trip generation rates for this alternative due to greater projected transit usage without on-site parking. [J-9]

Page 356, the third and fourth sentences are revised to read:

Vehicles that would travel eastbound on I-980 were distributed onto the 12th Street and 19th Street on-ramps (the former only for Alternatives 4 and 5). Vehicles that would travel southbound on I-880 were distributed between the 5th Street on-ramp and the 11th Street on-ramp of I-980. [J-9]

Page 357, Figure 89 is revised to show the correct trip distribution and to change the title to:

"Project Trip Distribution - P.M. Peak Hour Outbound." [J-9]

(Revised figures appear at the end of Chapter II of this Final EIR Addendum.)

Pages 363-365, the analysis of Parking is revised as follows, including the addition of a new Table 34, to account for City Administration Building visitor parking demand and for existing on-site parking that would be lost due to development of the project. (As stated in Chapter I, Introduction, of the Draft EIR/EIS, the "project area" includes the six alternative project sites, while the surrounding few blocks, including the project area, make up the "project area vicinity.")

3. PARKING

Impacts and Mitigation Measures

Alternatives 1, 2, 3, 4, 5, and 6 (All "Build" Alternatives)

Impact PARK-1 The project would not generate parking demand in excess of supply, and would not result in a parking shortage in the project area vicinity. This would not be a significant impact.

The addition of 335 employees with Alternatives 1-3 and 6 would result in the demand for a maximum of about 200 additional employee parking spaces given the current commuter patterns for City employees. The addition of 335 employees under Alternative 4, which would not provide any new parking spaces, would result in the demand for a maximum of about 185 additional employee parking spaces given the current commute patterns for City employees and the projection that vehicle trip generation would be five percent less [] due to the lack of parking. Similarly, the addition of 225 employees under Alternative 5 (with no additional parking spaces) would result in the demand for a maximum of about 125 additional employee parking spaces given the current commute patterns for City employees. Visitor parking could increase demand by between about 90 and 135 spaces, depending on the alternative.

Alternatives 1 and 2 would each provide approximately 235 on-site parking spaces, and would eliminate about 50 spaces, for a net gain of about 185 spaces; Alternative 3 would provide approximately 250 on-site spaces, and would eliminate about 100 spaces, for a net gain of about 150 spaces. Of the parking spaces provided, about half would be reserved for City employees and City pool vehicles, and the other half would be for public parking. Alternatives 4 and 5 [] would provide no new parking. Alternative 6 would provide about 160 spaces (half employee and pool vehicles, and half public) and would eliminate about 385 spaces, for a net loss of about 225 spaces.

Alternative 6 would include demolition of the Clay Street Garage, resulting in a loss of about 335 parking spaces, and would eliminate the lot on the west side of the Dalziel block, resulting in a loss of about 50 additional spaces. In conjunction with project demand of about 200 spaces for City workers, plus demand of about 40 spaces for retail uses, this alternative would result in a project area shortfall of about 600 spaces. Table 13 in Section V.F, Setting, indicates an off-street parking supply in the project area vicinity in excess of peak weekday demand of about 425. Therefore, this alternative would result in unmet parking demand in the project area vicinity, based on the parking supply available at the time the parking survey was completed. The figures in Table 13 do not include the newly opened City Center West Garage at 12th and Jefferson Streets, which was not in operation at the time of the parking survey. This approximately 1,450-space facility opened in June 1994. As of mid-September 1994, less than one-third of the garage capacity was in operation due to lack of demand. With the City Center West Garage now open, there would be adequate parking in the project area vicinity to accommodate the demand generated by Alternative 6. Some drivers would have to park farther from their destinations than at present, potentially contributing additional pedestrian traffic.

Alternatives 1, 2 and 3 would not add sufficient net new parking to the project area [] to accommodate demand generated by net new City employees and visitors. Because only half of the project parking spaces would be for employees and City pool vehicles, and the other half for the public, some City employees would park off-site in spaces currently occupied by pool vehicles; those pool spaces would become available through the movement of pool vehicles into the project garage.

Adding parking demand generated by retail space, Alternative 1 would not provide sufficient new parking to the project area [] and would result in a [] shortfall of about 210 spaces in the project area. With retail demand, Alternative 2 would result in a corresponding shortfall of about 170 spaces in the project area. Alternative 3 would have no retail space, but employee and office visitor demand would result in a shortfall of about 185 spaces in the project area. Alternatives 4 and 5 would provide no parking and thus would not meet project-generated parking demand with on-site parking; they would result in on-site shortfalls of about 400 and about 255 spaces, respectively, in the project area. Based on the existing parking availability described in Table 13, Section V.F, Setting, the parking demand of all of those alternatives [] could be met at existing off-site lots and garages in the project area vicinity. Some drivers might also choose to park in the newly opened City Center West Garage. As with Alternative 6, some drivers would have to park farther from their destinations than at present, potentially contributing additional pedestrian traffic. Parking impacts are summarized in Table 34.

As noted above, because City pool vehicles are currently dispersed throughout the greater City Center area, the provision of pool parking as part of the project would make available to the public and employees the parking spaces currently occupied elsewhere by pool vehicles. Similarly, City employees who currently park elsewhere in the greater City Center area and who would park in the City Administration Building garage would vacate currently occupied parking spaces, making those spaces available for public parking.

The Oakland Zoning Regulations do not require any off-street parking for Administrative Civic or Commercial uses in the C-55 or C-55/S-8 zone. No parking would be required for Alternatives 1, 2, 4, 5, and 6, which would be entirely within the C-55 or C-55/S-8 zones.

TABLE 34: PROJECT PARKING DEMAND AND SUPPLY

	Parking Demand					
	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6
Number of employees	335	335	335	335	225	335
Pct. drive alone /a/	60%	60%	60%	60%	60%	60%
Reduction /b/	0%	0%	0%	5%	5%	0%
Total employee demand	201	201	201	184	124	201
Visitor Demand /c/	<u>134</u>	<u>134</u>	<u>134</u>	<u>134</u>	<u>90</u>	<u>134</u>
Total Office Demand	335	335	335	318	214	335
Retail gross sq. ft. (1,000s)	37.5	13.0	0.0	50.0	24.5	24.5
Employees /d/	23	8	0	30	15	15
Customers /d/	<u>37</u>	<u>13</u>	<u>0</u>	<u>50</u>	<u>25</u>	<u>25</u>
Retail Demand	60	21	0	80	40	40
Total Demand	395	356	335	398	254	375
	Parking Supply					
	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6
Proposed new parking	235	235	250	0	0	160
Existing parking to be removed	<u>(50)</u>	<u>(50)</u>	<u>(100)</u>	<u>0</u>	<u>0</u>	<u>(385)</u>
Net new parking to be provided	185	185	150	0	0	(225)
Net project area shortfall	(210)	(171)	(185)	(398)	(254)	(600)
Off-street parking available /e/	<u>1,155</u>	<u>1,155</u>	<u>1,155</u>	<u>1,155</u>	<u>1,155</u>	<u>1,105</u>
Post-project parking surplus /e/	945	984	970	757	903	505

/a/ Includes one-half of carpool vehicles (assuming two persons per carpool)

/b/ Five percent reduction in employee parking demand applied to alternatives that would not include on-site parking.

/c/ Visitor demand estimated at 40 percent of number of employees, which is a conservative estimate.

/d/ Based on parking demand formulae for downtown San Francisco in: San Francisco Planning Department, "Guidelines for Environmental Review: Transportation Impacts." July 1991.

/e/ In project area vicinity; includes 425 spaces in existing lots and garages (375 spaces with Alternative 6) and 730 spaces in City Center West Garage (assumes 50 percent of garage capacity available)

SOURCE: Environmental Science Associates, Korve Engineering, City of Oakland

In the C-51 zone (western portion of Alternative 3), Administrative Civic uses must provide one parking space for each 1,400 sq. ft. of floor area. As proposed, the office portion of Alternative 3 would be within the C-55 zone, and the parking garage would be within the C-51 zone; therefore, no parking would be required. (The southern block of Alternative 3 is within the City Center Project Acquisition Area, as defined in the *Central District Urban Renewal Plan (CDURP)*; Administrative Civic uses in this area must provide one parking space for each 1,300 sq. ft. of floor area. Assuming that one-half of the office space would be within the CDURP area, about 170 parking spaces would be required. Alternative 3 would provide 250 spaces and would meet this requirement.) The Wells Fargo Building, part of Alternative 5, is also within the City Center Project Acquisition Area. This alternative would provide no new parking.

Mitigation Measure

PARK-1: None required by CEQA. However, the City shall institute a Transportation Demand Management (TDM) Program, which would reduce parking demand.

The implementation of an aggressive TDM program would reduce parking demand for all project alternatives. However, an on-site shortfall would remain with all "build" alternatives []. Alternative 6, which would demolish the Clay Street Garage, would result in the greatest shortfall in the immediate project area. As noted, however, with the opening of the City Center West Garage, adequate parking would be available in the greater City Center area. [J-10]

Pages 368 and 369, the text under Impact TRUCK-1 is revised as follows to incorporate potential truck loading on Kahn's Alley and to delete reference to semi-trailer truck traffic accessing the Taldan Block via 15th Street:

Truck access to the Taldan Block would be via Telegraph Avenue and Kahn's Alley, with trucks exiting onto San Pablo Avenue, or via the surface on San Pablo Avenue [] at a new turnaround at the junction with 15th Street. An underground loading dock that would be reached via ramps located on San Pablo Avenue midway between 15th Street and 16th Street has been considered, but is not likely to be constructed. If Kahn's Alley and San Pablo Avenue were used for truck loading, there would be potential pedestrian-truck conflicts unless loading activities were restricted to limited hours, such as in the early morning or late afternoon. [] The parking spaces currently located between 15th Street and 14th Street/Broadway would be removed and replaced by an enlarged pedestrian plaza. []

Truck access to the Dalziel block would be via a Clay Street or, possibly, 16th Street entrance to an off-street loading dock. There would be no significant truck-pedestrian conflicts resulting from the provision of an off-street truck loading dock at the Dalziel block or an underground loading dock at the Taldan Block. To maintain access to the turnaround at 15th Street for the scenario with an underground loading dock, the ramps would be located in the center of San Pablo Avenue with auto traffic reaching the turnaround (for pedestrian pickup and drop-off) via the outside lanes of the street.

As described above for Alternative 1, truck access to the Dalziel block (Alternative 2) would be via a Clay Street or, possibly, 16th Street entrance to an off-street loading dock. There would be no significant truck-pedestrian conflicts resulting from the provision of an off-street truck loading dock at the Dalziel block. Truck access to the Miller Federal Building/City Hall West block (Alternative 3) would be via a Jefferson Street entrance to an off-street loading dock. There would be no significant truck-pedestrian conflicts resulting from the provision of an off-street truck loading dock at the Miller Federal Building/City Hall West block. Truck access for the Rotunda Building (Alternative 4) would be via 16th Street, and would not result in a significant truck-pedestrian conflicts. Truck access for the Wells Fargo Building (Alternative 5) would be via an existing loading dock at City Center, off of 14th Street, and would result in no significant truck-pedestrian conflicts. Truck access to the Dalziel/Clay Street Garage block (Alternative 6) would be via a Clay Street or, possibly, 16th Street entrance to an off-street loading dock. There would be no significant truck-pedestrian conflicts resulting from the provision of an off-street truck loading dock at the Dalziel/Clay Street Garage block.

Mitigation Measures

TRUCK-1a: If surface-level loading for the Taldan Block is incorporated into Alternatives 1, 4, 5, or 6, the project sponsor shall ensure that truck loading is prohibited at the Taldan Block during hours of peak pedestrian activity, such as between the hours of 10:00 a.m. and 5:30 p.m.

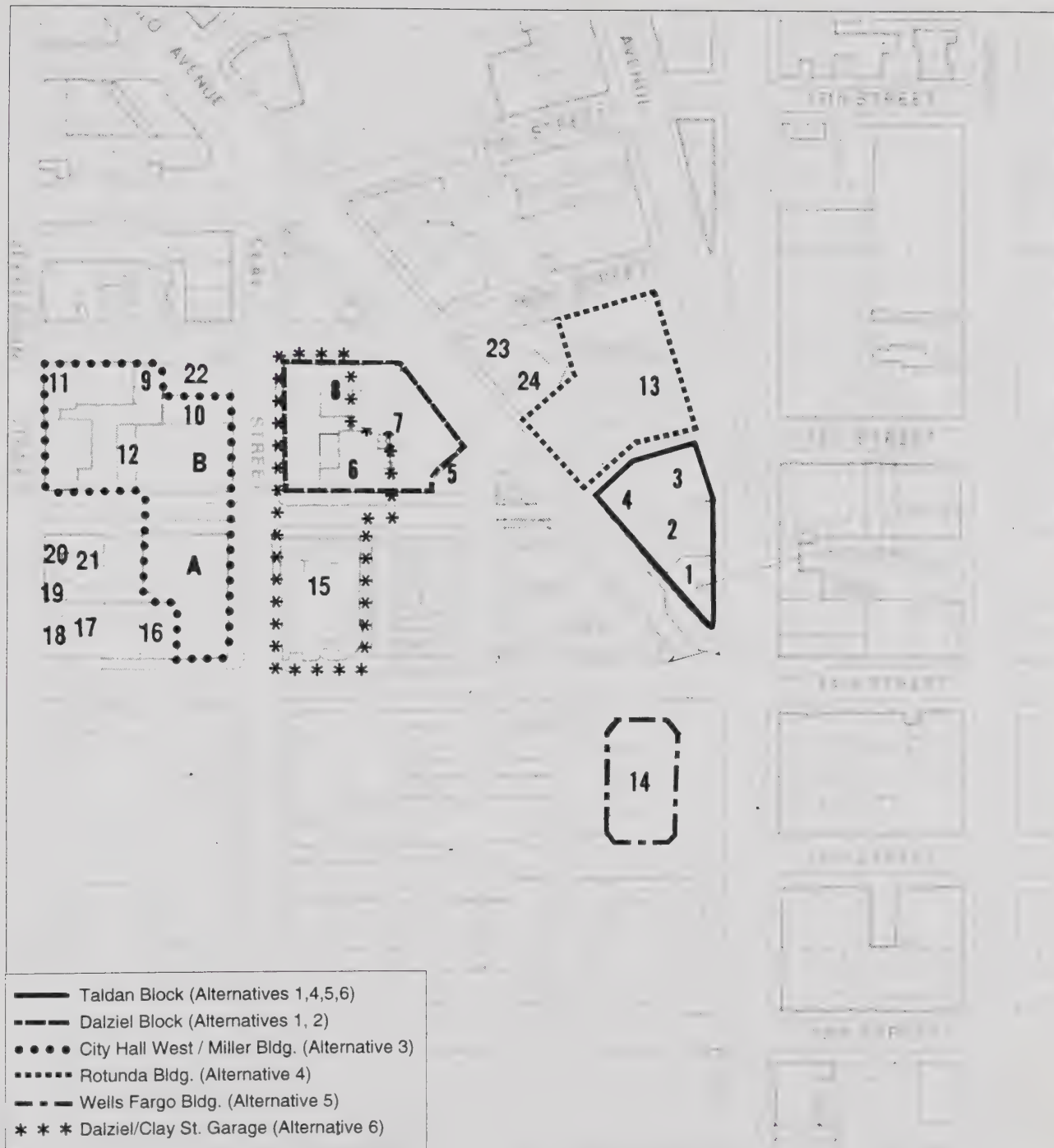
TRUCK-1b: If surface-level loading for the Taldan Block is incorporated into Alternatives 1, 4, 5, or 6, the project sponsor shall coordinate with vendors to attempt to restrict delivery vehicles to those that could be accommodated in a widened Kahn's Alley or the surface-level turning bulb on San Pablo Avenue, as applicable, and would prohibit Taldan Block delivery vehicles from using 15th Street.

Implementation of [] these mitigation measures would reduce the impact of truck-pedestrian conflicts to a less-than-significant level. [J-5]

Page 370, the impact labeled "HIST-6" should be labeled "HIST-5." [J-13dd]

Page 372, the text under "C. Cumulative Impacts" is revised as follows:

Cumulative effects are discussed in Chapter VI of this report, as part of the analysis of specific issue areas. In summary, cumulative effects to which all "build" alternatives would contribute include exposure of persons to seismically induced risks, wind effects, the loss of architectural resources in the Downtown District, effects on visual quality and urban design, increased traffic noise, and effects on traffic and air quality in the project area vicinity. With the exception of noise, [] architectural resources, and visual quality and urban design, these effects would not be significant after mitigation. [J-13ee]



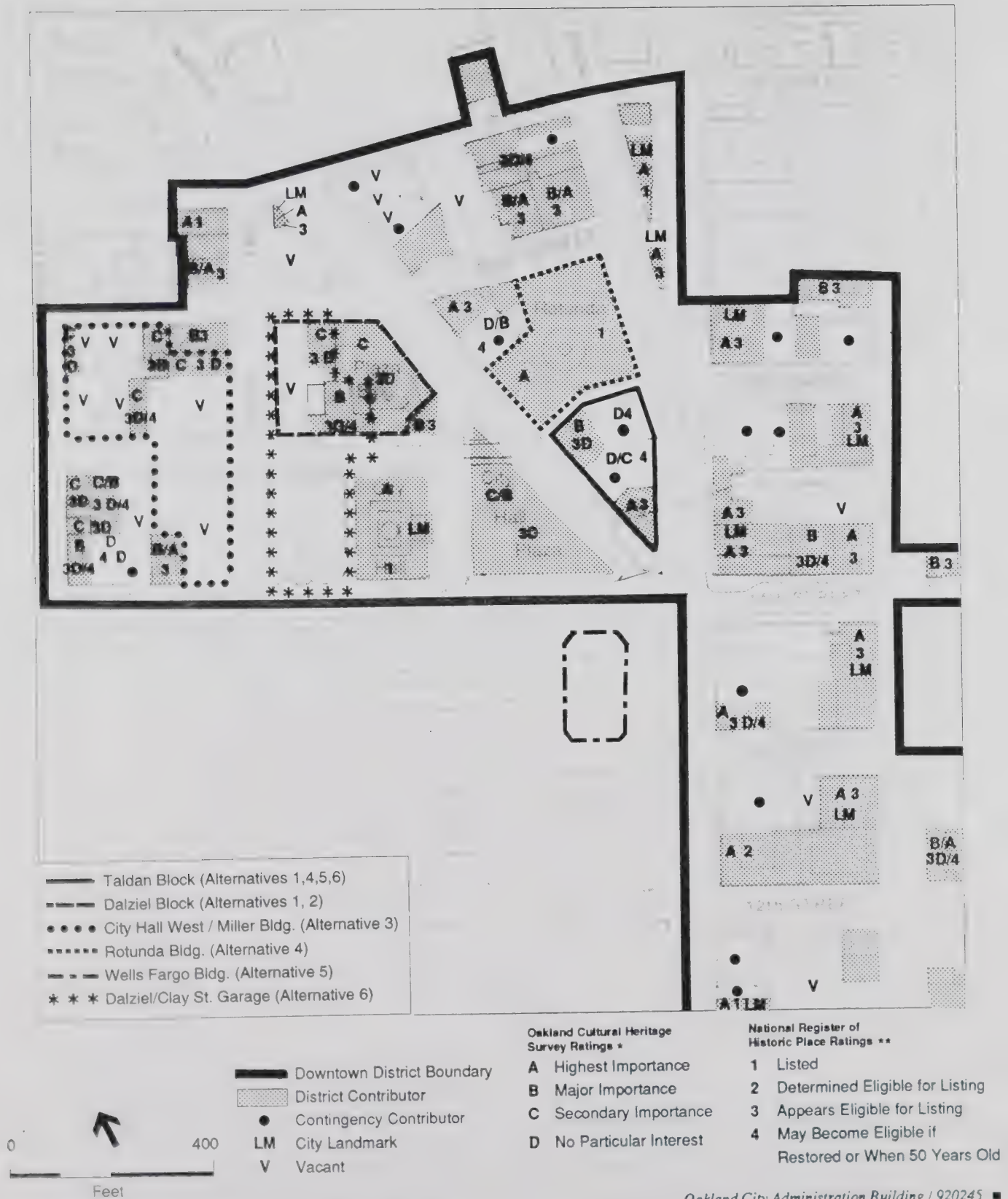
- | | | |
|---------------------------------------|---------------------------------|-------------------------------|
| 1. Broadway Building | 11. Tucker Building | 21. Hotel Oaks |
| 2. KCR Building | 12. Coakley Hotel Building | 22. Hotel Touraine |
| 3. Money Back Building | 13. Rotunda Building | 23. Oakland Commerce Building |
| 4. Woodward Building | 14. Wells Fargo Building | 24. Retail Store Building |
| 5. Plaza Building | 15. Clay Street Garage | A. City Hall West Site |
| 6. Dalziel Building | 16. Blood-Appleton Building | B. Miller Building Site |
| 7. Pardee Building (Midgley Building) | 17. Locke Building | |
| 8. MacLafferty Building | 18. Hotel Sutter | |
| 9. Alameda Co. Loan Assn. Building | 19. Hotel Savoy Cafeteria | |
| 10. M. Stulsaft Building | 20. Jefferson Inn (Hotel Savoy) | |

0 400
Feet

SOURCE: Environmental Science Associates,
Oakland Cultural Heritage Survey

Oakland City Administration Building / 920245 ■

Figure 10 (Revised)
Buildings on the
Alternative Project Site Blocks



SOURCE: Environmental Science Associates, Oakland Cultural Heritage Survey

NOTES: *District extends south to 11th Street and east to near Webster Street

** D - as part of district only

For combination ratings (e.g., "B/A" or "3D/4"), 1st is current; 2nd is potential if building were restored or new information becomes available

Unlabeled contributors outside Project Area are rated no higher than C-3D

Figure 11 (Revised)
Architectural Resources in Project Area Vicinity

Figure 23 (Revised)
On-Street Parking in Project Area Vicinity



SOURCE: Korve Engineering

Oakland City Administration Building / 920245 ■

Figure 89 (Revised)
Project Trip Distribution-
P.M. Peak Hour Outbound

III. LIST OF PERSONS AND ORGANIZATIONS COMMENTING ON THE DRAFT EIR/EIS

A. PERSONS AND ORGANIZATIONS COMMENTING IN WRITING

The following agencies, organizations, and individuals submitted written comments on the Draft EIR/EIS during the EIR review period (July 8 - August 29, 1994) and the EIS review period (July 15 - August 29, 1994).

Frederick C. Hertz, Attorney at Law
Carolyn Douthat, Esq., Preservation Action Committee, Oakland Heritage Alliance
Daryl B. Van Fleet
Carl Anderson
Brad Paul
Mary Warren, Chairperson, Board of Directors, Oakland Chamber of Commerce
Loretta Meyer, Environmental Assessment Supervisor, Port of Oakland
Leigh Jordan, Assistant Coordinator Historical Resources File System
David Farrel, Chief, Environmental Review Section, Office of Federal Activities,
U.S. Environmental Protection Agency
John S. English

B. PERSONS AND ORGANIZATIONS COMMENTING AT THE PUBLIC HEARING

The following persons provided DEIR comments at the Oakland City Planning Commission Hearing on the Draft EIR/EIS, at the Lakeside Garden Center on Wednesday, August 24, 1994.

Erza Rapport, Deputy City Manager
Mary Warren, Chair, Board of Directors, Oakland Chamber of Commerce
Michael Schafer
Frederick Hertz
Bradley Wiedmaier
Annalee Allen, Member, Landmarks Preservation Advisory Board
Anthony Dubovsky
Carl Anderson

C. PERSONS AND ORGANIZATIONS COMMENTING DURING SUPPLEMENTAL COMMENT PERIOD

The following agencies, organizations, and individuals submitted written comments on the Draft EIR during the supplementary EIR comment period (November 4 - November 18, 1994).

John B. Lampe, Director of Water Planning, East Bay Municipal Utility District
Christal Waters, Senior Environmental Planner, California Department of General Services
Carolyn Douthat, Esq., Preservation Action Committee, Oakland Heritage Alliance
John S. English

IV. WRITTEN COMMENTS AND RESPONSES TO WRITTEN COMMENTS ON THE DRAFT EIR/EIS

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Facsimile 510-451-4115

August 23, 1994

Joe DeLuca, Chair
Members of the Oakland Planning Commission
Oakland, CA

Re: Draft Environmental Impact Report on City Administration Buildings
ER92-7. Hearing Date August 24, 1994

Dear Mr. DeLuca and Members of the Commission:

I am writing to express my concerns regarding the adequacy of the Draft Environmental Impact Report on the City's proposed administration buildings. Please enter these comments in the public record, and forward them to the authors of the report for their response.

The Report is deficient in the following respects:

1. There is no true preservation alternative discussed in the Report. Mention is made of the possibility of restoring existing historic buildings for new uses, but this alternative is dismissed as impractical -- without ANY documentation to support this claim. The so-called preservation alternative is inherently inadequate, as it does not call for restoration of the existing buildings and requires the demolition of much needed parking in the area. There must be a thorough analysis of a genuine preservation alternative, which would restore the existing buildings and build new structures on currently vacant lots.

The Report is defective, in that it fails to evaluate the one alternative which would best minimize the damage to the historic buildings.

2. The mitigations proposed in the Report are inadequate, in that they do not go far enough to minimize damage to the remaining historic district. Attached to this letter is a letter summarizing a list of mitigations which should be adopted by the city of Oakland as part of this project, if the preferred alternative is to be accepted. This letter was recently presented to the city manager's office, and should be included as additional comments on the Report.

Very truly yours,

Frederick Hertz

FCH/mc

Frederick C. Hertz
ATTORNEY AT LAW

1970 Broadway, Suite 940
Oakland, CA 94612-2263

Telephone 510-451-4114
Facsimile 510-451-4115

RECEIVED

August 3, 1994

AUG 29 1994

Ezra Rapport
City Managers Office
One City Hall Plaza
Oakland, CA 94612

CITY PLANNING COMMISSION
ZONING DIVISION

Re: City Hall Plaza Project / City Hall Administrative Building. Preservation Priorities

Dear Ezra:

As we discussed at our recent meeting, members of the preservation community have met to review the proposed City Hall Plaza Revitalization Project and the draft EIR on the Administration Building project. In an effort to reach a consensus about this major Oakland effort, we have developed an outline of mitigations and implementation measures which would lessen the significant impacts of the project on individual historic buildings and the downtown historic district.

We believe that mitigations in the areas described in this letter will contribute to the success of the project in terms of its urban design, historic preservation and economic revitalization. We also believe that it is appropriate that the city staff be as specific as possible about these mitigations, as this will certainly be required as part of the Section 106 process.

In order for us to prepare our comments to the Environmental Impact Statement and to facilitate the Section 106 process, we would like to discuss specific actions which the city can undertake to implement appropriate mitigations. We understand that certain of these items will require city council participation, and for those mitigations, we understand that this would be handled as part of the project approval process.

In an effort to give focus to our meeting on August 18, 1994, we would ask that you review these proposed mitigations with staff of the appropriate departments. At the same time, we will try to refine the details of these proposed mitigations in advance of our August meeting. Where appropriate, we have included references to parallel mitigations presented in the EIR.

1. Broadway Building Mitigations (Impact HIST-1.5)

- a. Schedule for restoration of exterior (impl. of Mitigation HIST-2)
- b. Restoration of interior to Secretary of Interior standards,
especially replication of historic lobby, and schedule of same
- c. Guidelines regarding integrity of upper floor design upon renovation
- d. Restoration of BART entrance
- e. Schedule of facade repairs
- f. Use of main floor for retail or other public-service usage

2. Rotunda Building (Impact HIST-5, 6)

- a. Schedule of immediately needed repairs
- b. Schedule and priorities for planned \$5 million in interim repairs
- c. Schedule and priorities and funding sources for remaining repairs, if no tenant found
- d. Specification of interior renovation standards
- e. Hiring of qualified conservation expert to manage restoration and usage
- f. Long term schedule of interior renovation and usage

3. Pardee Building (Impact HIST-1, 5)

- a. Guidelines for retention of San Pablo facade, building area and storefronts
- b. Consideration of retention of 16th Street facade and storefronts
- c. Specification of renovation design standards (i.e. Sec. Interior's Standards)

4. Plaza Building (Impact HIST-5, 6)

- a. Schedule of renovations
- b. Specification of renovation design standards (i.e. Sec. Interior's Standards)
- c. Clarify type of main floor use

5. Plaza Design (Impact HIST-5)

- a. Insure preservation input into plaza design issues
- b. Insure proper treatment of historic tree
- c. Clarify treatment of plaza streets
- d. Include historic context in design guidelines

6. Downtown Historic District Incentive Program (Impact HIST-5)

- a. Creation of downtown historic district
- b. Determination of boundaries of National Register district
- c. Provide financial incentives for downtown historic district buildings (facade repair)
- d. Creation of loan fund for private rehab efforts and facade improvements
- e. city sponsorship of preservation resources, i.e. marketing, publicity, technical assistance
- f. Develop city staff programs to support district (see section 8, below)

7. Preservation Participation in Design of Administration Building (Impact HIST-3, 5)

- a. Establish criteria for jury selection, to include preservation architect and urban design professionals
- b. Insure preservation input into design and competition process
- c. Include preservationists on jury
- d. Refine historic design standards to address building location and relationship to surrounding district character

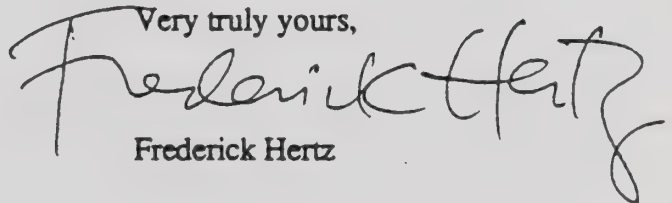
8. City Staff/City Programs (Impact HIST-5, 6)

- a. City to hire preservation monitor regarding city administrative buildings and process and EIR/§106 compliance
- b. City to develop improved stewardship of city owned historic downtown buildings, including appropriate staff for maintenance and renovation
- c. City development of city history exhibit
- d. City to explore application for Main Street program
- e. City to develop improved marketing of historic resources

As you can see from this list, we have worked hard to develop mitigations which are directly related to offsetting the consequences of demolishing buildings in the plaza area. We have also strived to develop mitigations which are consistent with the city's economic development goals for the downtown area.

Please feel free to give Carolyn Douthat or me a call should you have questions about these proposals. We look forward to meeting with you in August to discuss these issues in greater detail.

Very truly yours,



Frederick Hertz

cc: Carolyn Douthat
Annalee Allen
Phil Sendri
Jack Young
Jim Rinehart
Alan Dreyfus
Les Hausrath

FCH/mc

Letter A (Frederick C. Hertz, Attorney at Law)

- 1) The alternative of using existing buildings (plus construction on vacant land), was identified in the Draft EIR/EIS as having been considered and rejected by City staff. In response to comments on the Draft EIR/EIS, the alternative that would reuse existing buildings has been clarified. As described on pp. 32 and 33 of the Draft EIR/EIS, the use of existing buildings ("Existing Buildings on Taldan and Dalziel Blocks Alternative") would eliminate the significant unavoidable effects on architectural resources and on visual quality and urban design of all of the "build" alternatives considered in Chapter VI of the Draft EIR/EIS; however, this alternative also would present sufficient operational problems such that it would not achieve many of the project objectives. Therefore, this alternative has been considered and rejected as infeasible by City staff, and requires no further discussion beyond that provided in the EIR, including the revisions presented in this Final EIR Addendum (CEQA *Guidelines*, Sec. 15126(d)(2)).

Primary differences between the alternative analyzed in the Draft EIR/EIS and the revised "Existing Buildings on Taldan and Dalziel Blocks Alternative" presented in this Final EIR Addendum include: the revised alternative does not include incorporation of the Plaza Building into the City Administration Building program; the revised alternative includes use of the MacLafferty Building; and the revised alternative includes more new construction on the Dalziel block. Please see Chapter II.B, Addenda to the Draft EIR/EIS (p. 20 of this document), for the revised "Existing Buildings on Taldan and Dalziel Blocks Alternative."

- 2) Given that each of the "build" alternatives would require demolition of historic structures within the Downtown District and construction of larger, non-contributory structure(s) to house City offices, the Draft EIR/EIS identifies the project's effects on individual architectural resources (Impact HIST-1) and on the Downtown District (Impact HIST-5) as significant and unavoidable. The Draft EIR/EIS identifies mitigation measures that would reduce these impacts, although not to a less-than-significant level, including documentation of historic structures to be demolished (Measure HIST-1a); restoration and/or renovation of the Broadway and/or Rotunda Buildings, as applicable, in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Measures HIST-2 and HIST-4); and design of the new structure(s) in accordance with the Secretary's Standards and with design standards promulgated by the City (Measures HIST-5a and 5b) and in a manner that maximizes compatibility with the Downtown District (Measure HIST-5c).

IV. Written Comments and Responses

The Draft EIR/EIS also includes a measure that would reduce the deterioration of existing historic buildings (Measure HIST-6; now HIST-6a). The City Hall Plaza renovation would be executed in accordance with a separate series of recommendations developed by the City. The Draft EIR/EIS includes a measure to ensure preservation of the Oakland oak tree in City Hall Plaza (VIS-3). The commenter's recommendations for specific design measures, where applicable to the project, could be included in the City Administration Building design guidelines and/or the City Hall Plaza design recommendations, both of which are included in Appendix E of the Draft EIR/EIS and the most current versions of which appear in the Appendix to this Final EIR Addendum. (Only the text of the Plaza recommendations has been modified since publication of the Draft EIR/EIS.) Both the guidelines and recommendations are potentially subject to revision as part of the project approval process.

It should be noted, as stated in Chapter I, Introduction, of this Final EIR Addendum, that the Section 106 process will not occur because federal involvement with the City Administration Building project has been terminated.

Regarding the specific measures recommended by the commenter, please see Chapter II.B, Addenda to the Draft EIR/EIS, for new Mitigation Measure HIST-5d, Downtown District preservation incentives, which is added to p. 295 of the Draft EIR, and Mitigation Measure HIST-6b, Rotunda Building rehabilitation, which is added to p. 296. Please see also the response to Comment N-1, p. 144 of this Final EIR Addendum, for information in regard to the Broadway Building and Preservation Participation in the Design of the City Administration Building.

It should be noted that rehabilitation of the Broadway Building in accordance with the Secretary of the Interior's Standards is included in the Draft EIR/EIS as Mitigation Measure HIST-2. The Draft EIR/EIS also includes Mitigation Measure HIST-4, restoration and/or renovation of the Rotunda Building in accordance with the Secretary of the Interior's Standards if Alternative 4 is approved, and Mitigation Measure HIST-6 (now HIST-6a), maintenance of City-owned buildings in the project area that remain after project implementation.

Regarding the Pardee Building, as Alternative 1A is the preferred alternative, City staff have rejected retention or renovation of the Pardee Building. Demolition of this building would be a significant, unavoidable effect of Alternatives 1, 1A, and 2, as stated in

Impact HIST-1, p. 281, of the Draft EIR/EIS, and in the discussion of Alternative 1A, p. 9 of this Final EIR Addendum. It should be noted that the preferred project as currently proposed would include a setback on the San Pablo Avenue frontage of the Dalziel block at approximately the height of the existing Pardee Building to recall the Pardee Building facade.

Regarding the Plaza Building, this building is not part of the City Administration Building project, and no mitigation is required. The following is provided for the reader's information. The City proposes to rehabilitate this structure. This separate project, which may require separate environmental review, is currently envisioned to include a seismic upgrade and repairs to bring the building into compliance with building and fire codes. When this project is successfully completed, the City could offer current tenants of the Pardee Building space in the restored Plaza Building.

Regarding City Hall Plaza, City staff have agreed to include elements that enhance the historic character of the plaza as part of the rehabilitation; such elements could include, for example, historically appropriate light fixtures or early 20th-century iron work. (Preservation of the Oakland oak tree is included in the Draft EIR/EIS as Mitigation Measure VIS-3.)



August 26, 1994 RECEIVED

AUG 29 1994

Oakland City Planning Commission
 Attn: Anu Raud
 Environmental Review Coordinator
 Oakland City Planning Department
 421 14th Street, 1st Floor
 Oakland, CA 94612

CITY PLANNING COMMISSION
 ZONING DIVISION

Re: ER92-7/Oakland City Administration Building

I am writing on behalf of Oakland Heritage Alliance to comment on the draft EIR/EIS for the proposed Oakland City Administration Building. The comments address three areas, the sufficiency of the alternatives analysis, proposed mitigations for the preferred alternative, the Taldan/Dalziel site, and mitigation monitoring.

Alternatives Analysis

Of the unavoidable impacts identified in the document, four out of five are related to the demolition of historic buildings within the National Register eligible Downtown District. Given that conclusion, CEQA Guidelines require an alternatives analysis which focuses on alternatives which are capable of eliminating significant adverse effects on historic resources, even if the alternatives do not meet all of the project objectives or would be more costly. (Guidelines 15126 (d)).

Among the alternatives considered but not selected for study was reuse of the historic buildings on the Taldan and Dalziel sites with new construction on the vacant parcels. This alternative, which is acknowledged in the document to be environmentally superior, should be fully analyzed. Other alternatives which would further focus the analysis on reducing significant adverse effects include (1) reuse of the buildings on the Taldan site with new construction on the Dalziel site as per Alternative 1, and (2) development of the Taldan site as per Alternative 1 with a combination of reuse of the historic buildings and new construction on the Dalziel site.

Absent analyses of these preservation alternatives, it is impossible to determine whether there exists a scheme which would substantially achieve the project objectives while reducing the adverse effects on historic resources.

Mitigations

One of the major adverse impacts of the preferred alternative is the effect on the integrity of the National Register eligible Downtown District. The mitigations proposed in the draft EIR/EIS to address this impact only in terms of the design of the new buildings. The attached letter sets out a variety of additional mitigations which could rectify some of the impacts on the district as a whole as well as minimize the effects on individual historic resources which are part of the proposed project.

2

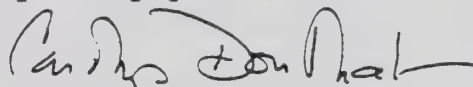
Mitigation Monitoring

A substantial number of the proposed mitigations are related to impacts on historic resources. Accordingly, the mitigation monitoring program should include a qualified historic preservation professional to coordinate and oversee implementation of these mitigations during the course of the project. Additional monitoring provisions, particularly having to do with scheduling commitments for repairs to historic resources, are contained in the attached letter.

3

Thank you for the opportunity to comment.

Very truly yours,



Carolyn Douthat, Esq.
Preservation Action Committee

Letter B (Carolyn Douthat, Esq., Preservation Action Committee, Oakland Heritage Alliance)¹

- 1) The CEQA Guidelines (Sec. 15126(d)) state that project alternatives must "feasibly attain most of the basic objectives of the project." The Draft EIR/EIS analyzes a reasonable range of alternatives that generally would meet the basic project objectives. Those objectives include the provision of City office space to replace space lost as a result of the 1989 Loma Prieta earthquake, as well as several other basic City objectives that are discussed on p. 4 of the Draft EIR/EIS. Several of the alternatives analyzed would not meet one or more of those objectives. Some would fail to meet several objectives, although all would meet the first and primary objective, provision of City office space through maintenance and expansion of the presence of City offices in the immediate vicinity of the renovated historic City Hall.

The alternatives analyzed in the Draft EIR/EIS, including the revised "Existing Buildings on Taldan and Dalziel Blocks Alternative" analyzed in this Final EIR Addendum, would entail a range of impacts on historic resources, from virtually no demolition (with the "Existing Buildings on Taldan and Dalziel Blocks Alternative") to demolition of between three and six historic structures, depending on the "build" alternative selected. New construction would range from one new building of eight stories or less to an 11-story building to construction of three new buildings. Other alternatives could have been postulated, but the impacts would have been within the range of impacts identified in the Draft EIR/EIS, assuming development of the project consistent with the City's primary objective of maintenance and expansion of the presence of City offices in the immediate vicinity of the renovated historic City Hall. Nevertheless, the Draft EIR/EIS provides adequate information for the decision makers to evaluate the environmental effects of all alternatives analyzed, including those alternatives not selected for further study, as well as the two alternatives suggested by the commenter and other similar variants that might involve a different combination of buildings in the project area but would result in impacts within the range identified in the Draft EIR/EIS and described above.

- 2) Mitigation measures are identified in the Draft EIR/EIS to reduce the project's impacts on the Downtown District; *i.e.*, the effects of demolition of existing contributory structures and construction of new, non-contributory building(s). (See Impact HIST-5, p. 287, and Mitigation Measures HIST-5a, 5b, and 5c, pp. 294-295. Impact HIST-5 also analyzes

¹ This letter was also sent to Sandro Amaglio, Regional Environmental Officer, FEMA Region IX.

cumulative effects, including the proposed State Office Building.) These measures would not reduce effects on the district to a less-than-significant level, and the impact would be significant and unavoidable. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for new Mitigation Measure HIST-5d, Downtown District preservation incentives, which is added to p. 295 of the Draft EIR, and Mitigation Measure HIST-6b, Rotunda Building rehabilitation, which is added to p. 296. Regarding additional measures suggested by the commenter, please see also the responses to Comments A-2 and N-1, p. 49 and p. 144, respectively, of this document. (The "attached letter" referred to by the commenter is the August 3, 1994, letter from Frederick C. Hertz, Attorney at Law, to Ezra Rappoport, Deputy City Manager, City of Oakland, that appears as part of Comment A-2.)

In addition to the above, Impact HIST-6 analyzes potential impacts to City-owned properties in the project area that would not be rehabilitated or demolished as part of the project, and Mitigation Measure HIST-6 (now HIST-6a) would require establishment of a maintenance program for those buildings.

As noted on p. 91 of the Draft EIR/EIS, the City in March 1994 adopted a Historic Preservation Element of the Oakland *Comprehensive Plan*. The Historic Preservation Element includes Policy 3.2, Historic Preservation and City-Owned Properties, which calls for preservation of City properties warranting preservation (see p. 92). The Historic Preservation Element also includes policies and programs to encourage preservation of privately owned historic properties.

- 3) A mitigation monitoring program will be prepared by the City as part of the project approval process, pursuant to CEQA Section 21081.6. As the project sponsor and lead agency under CEQA, the City of Oakland would have primary responsibility for both implementation and monitoring of mitigation measures adopted as conditions of project approval.



Bibliomania

©

RECEIVED

AUG 29 1994

CITY PLANNING COMMISSION
ZONING DIVISION

August 28, 1994

Dear sirs:

My name is Daryl B. Van Fleet. I am the owner of Bibliomania, an antiquarian bookstore located at 1539 San Pablo Avenue. I am writing to convey the concerns of the artists and booksellers of the Pardee Building about the negative impact of the destruction of the Pardee Building on ourselves and on the cultural life of the city of Oakland, an impact which I feel has not been adequately addressed in the Draft EIR.

Bibliomania is one of four such bookstores in the Pardee Building, which also houses a number of artists' studios. There is a tradition of antiquarian book-selling on this block which dates at least from 1941. The artists' studios have been a part of the Pardee Building since the early 1960s if not before. Such prominent artists as Diebenkorn, Bechtel and McLean have had studios in the Pardee (as is noted in the Draft EIR) and at present such artists as Mary O'Neil and Tony Dubovsky have studios here. If the Pardee Building is demolished a rich part of Oakland's cultural heritage will be destroyed with it.

I am not arguing against the City's plan for an administration building per se but only against two of the proposed alternatives which would result in the destruction of the Pardee Building, namely sites one and two. Of the objectives

for the project as outlined in the Summary of the Draft EIR (p. S-2) it would seem that only the 3rd and 4th points dealing with the efficiency to be derived from large floor plates and the desire to construct a "one-stop" center for planning and building services (which would allegedly require such a large floor plate) would seem to indicate any particular advantage in the utilization of these site alternatives. I think that a careful reading of the entire Draft EIR would bear out this assertion. I am certainly not opposed to increased efficiency in government, nor am I unwilling to grant that some increased governmental efficiency might result from the construction of an administrative building with the large floor plates that are possible on the Dalziel Block. However, the City is not seeking this alleged increased efficiency in a vacuum. At what cost is this increase obtained? It is not enough for the City to show that its preferred site is somewhat better than the other proposed alternatives but rather it is incumbent on them to demonstrate that their preferred alternative is so far superior that the positive results of pursuing that alternative outweigh the negative effects of demolishing the Pardee Building. This they have failed to do and, I would submit to you, this they are unable to do.

The City maintains that they have a relocation agreement with the Pardee tenants. What they really have is a non-binding "conceptual agreement" with some of the Pardee tenants which has never been submitted to the membership of the tenants' association for ratification. That this "conceptual agreement" is unworkable should be immediately apparent to anyone who reads it. It is based on the notion that it is possible to move the tenants out and then provide them with new storefronts and artists' studios (in the Plaza Building) at some unspecified time (two years? three years? longer?) in the future. Some of the booksellers could be driven into bankruptcy by the economic strain of a double relocation. None of the artists that I have talked to has expressed any enthusiasm for relocating to the Plaza Building.

All of the foregoing adds up to one result: There will be no booksellers' row or

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artists' community on the Dalziel block if the City is allowed to demolish the Pardee Building. Most of those driven out would not return. Once the City demolishes the Pardee Building this important component of Oakland's cultural life will cease to exist. I don't need to remind you that the number and variety of its bookstores, particularly antiquarian bookstores, are indicators of the cultural life of the community. With the immanent demise of the Holmes Book Co. and with the proposed demolition of the Pardee Building the city of Oakland could well end up without a single antiquarian bookstore worthy of the name! It would be particularly tragic if this situation were to come about as a result of actions taken by the City government.

On page 277 of the Draft EIR it states that pursuing alternatives one and two "would result in the displacement of existing land uses," specifically mentioning bookstores and artists' studios, and concludes that "this would not be a significant impact." On page 278 it states that no mitigation measures would be required. I feel that this is totally inadequate. The EIR should address the impacts of pursuing site alternatives one and two on 1) the artists and booksellers and 2) on the cultural fabric of the community which would certainly be adversely effected. I would contend that the negative effects of the destruction of the Pardee Building would have an impact on the community far out of proportion to the rather minimal advantages to be derived from large floor plates.

In the preceding paragraphs I have dealt with the historical, cultural uses of the Pardee Building, a factor which was almost totally neglected in the Draft EIR. I think that the Pardee Building has architectural merit which has not been acknowledged. The City survey which rated the Pardee Building a "C" was obviously written by someone who never set foot in it. I suggest that anyone who doubts that the Pardee Building has any architectural merit should inspect the large interior room at 1551 San Pablo Avenue with its 20 foot ceilings, huge skylight, mezzanine with glassed-in office, etc.

I think that the City's stated objective of "renovating primary resource historic

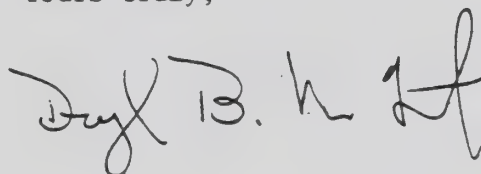
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buildings" is laudable but that thier various plans involve in varying degrees the destruction of an historic district. Their preferred alternative would restore two historic buildings and destroy six, not a very favorable ratio. There is really no way to "mitigate" this.

In conclusion, the city of Oakland can have both a city administrative building and the Pardee Building by choosing from the alternative sites other than numbers one and two. If it comes down, however, to a choice between the preservation of the Pardee Building and all it represents and having large floor plates then there is really only one choice that can decently be made.

Yours truly,

A handwritten signature in dark ink, appearing to read "Daryl B. Van Fleet". The signature is fluid and cursive, with the first name "Daryl" being the most prominent.

Daryl B. Van Fleet

Letter C (Daryl B. Van Fleet, Bibliomania)

- 1) Effects on the existing land uses are adequately described in the Draft EIR/EIS, including this Final EIR Addendum. To the extent that the commenters express a preference for project alternatives that would not result in demolition of the Pardee Building and displacement of its current tenants, those comments will be reviewed by the decision-makers (the Oakland City Council) for consideration as part of the project approval actions.

The Draft EIR/EIS describes, on pp. 277-279, the business relocations that would be required for the various project "build" alternatives. For alternatives including the entire Dalziel block (Alternatives 1 and 2), seven retail businesses would be displaced, including four used and antiquarian book sellers. (The number of bookstores has been reduced by one since publication of the Draft EIR/EIS, as one bookstore has moved to Grand Avenue since the Draft EIR/EIS was published. In addition, three other businesses have closed since publication of the Draft EIR/EIS.) The criteria for determination of a significant impact in the area of Land Use, Plans and Zoning, as described on p. 275 of the Draft EIR/EIS, state that based on CEQA Guidelines, the project would have a significant effect on the environment if it would conflict with adopted environmental plans and goals of the community where it is located, if it would displace a large number of people, if it would disrupt or divide the physical arrangement of an established community, or if it would conflict with established recreational, educational, religious, or scientific uses of the area. Based on the significance criteria, the relocation of fewer than 10 retail businesses and 12 upper-story tenants (mostly artists) would not constitute a significant impact because of the relatively small magnitude of the impact.² Therefore, the project would not conflict with adopted environmental plans and goals, would not displace a large number of people, would not disrupt or divide the physical arrangement of an established community, and would not conflict with established recreational, educational, religious, or scientific uses of the area. The following is provided as additional information.

It is true that the antiquarian booksellers in the Pardee Building represent the most substantial concentration of used book dealers in Oakland (and a substantial percentage of such stores in the city), although there are several in Berkeley and other surrounding communities, and thus can be seen as a small but unique feature of Oakland's economic and cultural life. Based on comments made by one bookstore owner, and accepting for the

² For CEQA purposes, social and economic impacts are not in and of themselves considered significant impacts on the environment (CEQA *Guidelines* Sec. 15131(a)).

sake of this analysis the notion that used book sales benefits from a "critical mass" of several stores in close proximity to each other (and possibly to transit), it is possible that one or more of the book dealers in the Pardee Building would suffer financial hardship or be financially unable to survive temporary relocation, particularly if the new location were not nearby and/or were not close to other used bookstores, if rents were not favorable, or if access were difficult. A second relocation, back to the Dalziel block, while desirable, could also prove financially risky. (It should be noted that there is no certainty that any or all of the bookstores would be financially successful in the future in their current locations.) But based on the significance criteria noted above, the loss of the antiquarian booksellers in the Pardee Building, while a potential matter of concern for the decision-makers (the Oakland City Council), and certainly of vital importance to store owners and some customers, would not constitute a significant effect on the environment. It also should be noted that, as stated on p. 120 of the Draft EIR/EIS, the Pardee Building has historically been occupied by a variety of retail and office tenants, and that a large portion of the ground floor was occupied by a New York Fabrics store until the 1980s. The first book store in the building was the Gull Bookstore, which moved from the adjacent Dalziel Building in 1977. (In the Dalziel Building, the Gull had replaced an earlier book store that opened in 1941.) The Pardee Building's importance as an historical and cultural resource derives from its link to the Downtown District, a City-designated historic district that is described in the Draft EIR/EIS beginning on p. 98, and not from the current uses that occupy the building.

The artists' presence in the Pardee Building dates from the 1960s, as stated on p. 120 of the Draft EIR/EIS. The potential dislocation of these artists, should relocation to the Plaza Building prove unsuccessful, also would be of concern to decision-makers, the artists themselves, and others. However, it would not be considered significant, based on the criteria noted above.

The decision-makers (the Oakland City Council) would consider information about potential loss of the bookstores and artists, along with other information about each alternative, including the potential efficiency of each alternative in determining whether a particular alternative would be approved.

It should be noted that the Draft EIR/EIS analyzes environmental effects of the project alternatives, but does not analyze operational differences between alternatives. That comparison was included in the review of various alternatives conducted by the Advisory

IV. Written Comments and Responses

Committee, made up of Oakland citizens and City staff, during 1992. City staff and consultants have continued to evaluate operational characteristics of various alternatives (including the revised "Existing Buildings on Taldan and Dalziel Blocks Alternative" analyzed in this Final EIR Addendum; see the response to Comment A-1, p. 49). The City Council, as the City decision-making body, will have the responsibility for comparing alternatives both on environmental and operational grounds and selecting one alternative (including, potentially, the No-Project Alternative) for approval.

- 2) The architectural significance of the Pardee Building is discussed in Section V.D.1 of the Draft EIR/EIS, where it is noted in Table 8, p. 103, that the Pardee Building is of secondary importance in the Oakland Cultural Heritage Survey's inventory of buildings in the Downtown District. The Pardee Building is Contributory to the Downtown District and appears eligible for listing on the National Register of Historic Places as part of the Downtown District. The building's architecture and history is described on p. 120. In a separate evaluation of buildings in the project area, it is noted that the Pardee Building could become individually eligible for listing on the National Register "because of its association with recent development in art history" following the passage of 50 years' time since those events (*i.e.*, 50 years after the 1960s) (Carey & Co., 1993). That the project would have a significant, unavoidable impact on architectural resources through demolition of existing historic buildings, including the Pardee Building, is stated in the Draft EIR/EIS on p. 283.

REFERENCE (Letter C)

Carey & Co., 1993. "Buildings in the Vicinity of Oakland City Hall: Building Histories (Draft)"
Prepared for the City of Oakland Redevelopment Agency. November 22.

August 27, 1994

Rec'd
8/29/94



Anu Raud, Environmental Review Coordinator
Office of Planning and Building
421 - 14th Street, Room 100
Oakland, CA 94612

Re: State Clearinghouse No. 93091065

Dear Ms. Raud:

Thank you for the opportunity to comment on the Draft Environmental Impact Report / Draft Environmental Impact Statement for the Oakland City Administration Building. The document is complex and lengthy, therefore I have limited my comments to questions I have regarding three areas where I believe there are serious and significant shortcomings:

PROJECT DISCRIPTION

On page five, four key criteria are listed as having been used in the selection of a preferred alternative. They are cost, operational efficiency, economic impact, and historic preservation / urban design. At no place does the DEIR/DEIS refer to the project fitting in to an overall plan for the revitalization of downtown Oakland. My questions are:

1. Does such a plan exist?
2. If not, is one being prepared?
3. Is small business retention a goal of the City of Oakland?
4. How does the project fit in with the above plan or goal?

1

ALTERNATIVES CONSIDERED

On page 13, seven criteria are listed as the reasons Alternative One is the preferred alternative for the City of Oakland. On page 22 the DEIR/DEIS states that Alternative Four is not the preferred alternative because the Rotunda Building has a large interior atrium and irregular and closely spaced columns that make it inappropriate for office use. My questions are:

2

1. Are the criteria listed for Alternative One applicable to Alternative Four?
2. If consolidation of city offices is a criteria does Alternative Four do a better job than Alternative One?
3. If renovating primary resource historic buildings is a criteria does Alternative four do a better job than Alternative One?
4. Are large interior atriums and irregular and closely spaced columns considered by some to be desirable architectural features and amenities?
5. How are the deficiencies of the Rotunda Building outweighed by the benefits of Alternative Four as the environmentally superior alternative under CEQA?

2
Cont.

ENVIRONMENTAL IMPACTS

In this section I have questions regarding statements by the DEIR/DEIS on pages 277 and 278, Impact Land-2 and possible mitigation measures. Those questions are:

1. Were there specific conditions, *i.e.* favorable leases, access to BART, sufficient square footage, that enabled five bookstores to sucessfully locate at the Pardee Building? Was one of those conditions the ability to cluster used and antiquarian bookstores at one location?
2. What would the impact be on the cultural, historical, and intellectual life in the City of Oakland if the bookstores were to go out of business? Would this be a significant impact?
3. If this is determined to be a significant impact would mitigations be required under Title 40, Code of Federal Regulations?
4. Should any proposed mitigations directly relate to the specific conditions that I have inquired about above in question one?

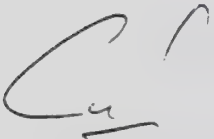
3

5. What would the impact be on the bookstores be if they required to temporarily relocate as suggested in the mitigation measure for Land-2. Would the bookstores be able to survive such a relocation? Would they be relocated as a cluster or individually? Would temporary relocation be considered an impact that would need mitigation?

3
Cont.

Again, thank you for the opportunity to comment on the DEIR/DEIS for this important project. I look forward to having my questions answered in the final version.

Sincerely,



Carl Anderson

Letter D (Carl Anderson)

- 1) As stated on p. 93 of the Draft EIR/EIS, in Section V.C.1., Land Use, Plans and Zoning, the Oakland *Comprehensive Plan* contains a Central District Plan, adopted in 1966. Among the policies in the Central District Plan, noted on p. 93, are to strengthen the Central District's existing role as an important office center (including government offices), to maintain its role as a leading retail and service center, and to establish for it an important role as a cultural and entertainment center. The plan also calls for creation of a definite sense of "place" in the Central District. The Draft EIR/EIS states, on p. 93, that all alternatives that would construct a new City Administration Building(s), which would include the revised "Existing Buildings on Taldan and Dalziel Blocks Alternative" analyzed in this Final EIR Addendum (see the response to Comment A-1, p. 49), would generally respond to the identified policies in the Central District Plan.

Section V.C.1 also discusses the proposed project in relation to the Land Use Element and Historic Preservation Element of the *Comprehensive Plan*, as well as in relation to the Oakland Redevelopment Agency's *Central District Urban Renewal Plan*.

In December 1994, the Oakland Redevelopment Agency adopted a five-year implementation plan for the Central District Urban Renewal Area. That plan sets forth a number of priority actions, including construction of a new City Administration Building, renovation of City Hall Plaza, renovation of the Rotunda Building, locating a state office building in the City Hall area, creation of a destination retail node along Broadway, San Pablo Avenue and Telegraph Avenue between 18th and 20th Streets, and regulation relief plus investment to facilitate/encourage production of market-rate and affordable housing in the Downtown area. The project would be consistent with this implementation plan.

Regarding small-business retention, the Office of Economic Development and Employment (OEDE) operates or oversees several programs. The Business Support Center, a network of City departments and other local agencies coordinated by OEDE's Business Development Division, provides permitting and license assistance, site location services, help in securing loans, technical assistance, and information on Enterprise Zone benefits. The Oakland Small Business Growth Center is a non-profit small business "incubator" service that provides affordable rent, on-site technical assistance and reduced-cost business services to small, emerging companies. OEDE operates a Micro-Loan

Program and a U.S. Department of Housing and Urban Development Section 108 for qualifying local businesses. The Neighborhood Commercial Revitalization Program assists in development and implementation of physical, economic and community revitalization programs in various Oakland neighborhoods.

- 2) The CEQA Guidelines (Sec. 15126(d)) state that project alternatives must "feasibly obtain most of the basic objectives of the project." As stated on p. 1 of the Draft EIR/EIS, the purpose of and need for the project is to replace City office space lost in the 1989 earthquake through occupancy of City-owned office space. In addition, the City, as project sponsor, has additional objectives for the project (CEQA Guidelines Sec. 15124(b)), which are stated on p. 4 of the Draft EIR/EIS. Several of these objectives, as noted by the commenter, are summarized on p. 13 of the Draft EIR/EIS in regard to Alternative 1 (Taldan/Dalziel). To compare each alternative's ability to obtain project objectives, for each of the other alternatives analyzed in Chapter VI, Chapter IV states the City's objectives that would not be met by each rejected alternative.

In regard to the commenter's questions concerning the comparison of Alternative 1 to Alternative 4, the criteria listed on p. 4 of the Draft EIR/EIS are applicable to all alternatives analyzed in Chapter VI, and were considered by the City in developing alternatives for environmental review. Effects on historic buildings are described in Section VI.D.1 of the Draft EIR/EIS, which notes in Table 24 (p. 282) that Alternative 1 would result in demolition of six buildings, including four contributors to the historic district, and rehabilitation of the Broadway Building. Alternative 4 would result in demolition of three buildings, including one district contributor, and rehabilitation of the Broadway and Rotunda Buildings. The decision-makers (the Oakland City Council) would consider that information, along with other information about each alternative, including the potential efficiency of the Rotunda Building's interior layout and potential other uses for the Rotunda Building and existing buildings on the Dalziel block, in determining whether Alternative 1 or Alternative 4 would be approved. Similar information would be considered in regard to other alternatives analyzed in the Draft EIR/EIS.

As stated in the response to Comment C-1, p. 60 of this Final EIR Addendum, the Draft EIR/EIS analyzes environmental effects of the project alternatives, but does not analyze operational differences between alternatives. That comparison was included in the review of various alternatives conducted by the Advisory Committee, made up of Oakland citizens and City staff, during 1992. City staff and consultants have evaluated operational

characteristics of various alternatives (including the revised "Existing Buildings on Taldan and Dalziel Blocks Alternative" analyzed in this Final EIR Addendum; see the response to Comment A-1, p. 49). The City Council, as the City decision-making body, will have the responsibility for comparing alternatives both on environmental and operational grounds and selecting one alternative (including, potentially, the No-Project Alternative) for approval.

- 3) Please see the response to Comment C-1, p. 60, which discusses the concentration of bookstores in the Pardee Building and acknowledges that bookstores could be adversely affected by relocation. As stated on pp. 277-279 of the Draft EIR/EIS, and expanded upon in response to Comment C-1, impacts related to displacement of existing uses on the alternative project sites, including the bookstores in the Pardee Building, are not considered significant, and no mitigation is required.³

³ It should be noted, as stated in Chapter I, Introduction, of this Final EIR Addendum, that federal involvement with the City Administration Building project has been terminated, and therefore Title 40 of the Code of Federal Regulations, which contains the Council on Environmental Quality NEPA Regulations (40 CFR Sec. 1500 *et. seq.*), no longer applies to the project. However, the Draft EIR/EIS considered impacts on the bookstores in the context of both state and federal environmental review requirements and found no significant impact requiring mitigation.

Comments and Questions Regarding Draft EIR
OAKLAND CITY ADMINISTRATION BUILDING
JULY 1994

Anu Raud
Environmental Review Coordinator
Office of Planning and Building
City of Oakland
1330 Broadway, Suite 310
Oakland, CA 94612

Dear Ms. Anu,

What follows are my written comments regarding the July 1994 Draft EIR for the OAKLAND CITY ADMINISTRATION BUILDING. Overall I found the DRAFT EIR to be insufficient in a number of aspects, large and small, but particularly with regards to the treatment of alternative 6. As you know, a DRAFT EIR's sufficiency is judged by the following;

15151 Standards for Adequacy of an EIR. An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision, which intelligently considers environmental consequences.... the sufficiency of an EIR is to be reviewed in light of what is reasonable and feasible. Disagreement among experts does not make an EIR inadequate, the EIR should summarize the main points of disagreement among the experts.

I should preface my comments with a general economic issue that must be addressed in the EIR. For the past six months I have been one of a number of people leading a regional effort to keep Kaiser from leaving Oakland for Emeryville. As part of that effort this broad based coalition of environmental, neighborhood, housing, historic preservation, labor and community groups is united in its desire to economically revitalize downtown Oakland.

We believe that locating Kaiser's new medical facility (and its 4,000 workers) in the underutilized area between Oakland City Center and the 19th St. BART station will jump start the economy of downtown Oakland, encouraging renovation of nearby buildings and renovation/ construction of new housing on nearby blocks.

As important as keeping Kaiser is, it is equally important that Oakland protect those unique, regional retail destinations it currently enjoys and build on them whenever possible.

I would argue, from personal experience, that the used bookstores in the Pardee Building, together with DeLauer's Magazine Store, with their close proximity to BART, are unique irreplaceable regional economic draws. Relocating either one, even for a year or two, would do irreparable harm to Oakland's economy.

Let me give you a very concrete example. Over the past two years I have joined a growing number of used book collectors in the Bay Area. Since I became involved in the Keep Kaiser in Oakland effort I visit downtown Oakland at least once every two weeks for the past six months. On average each month I visit all the used bookstores in the Pardee Building and purchase between \$30 and \$50 worth of books. I stop by DeLauers and purchase \$10-20 of magazines and newspapers and eat at least two meals (\$10-25) downtown. That comes to \$50 to \$95 a month or \$600 to \$1,140 a year.

As a San Francisco resident I spend that kind of money in downtown Oakland for two reasons. The 12th Street BART station is just 8 minutes from downtown San Francisco and 15 minutes from home on MUNI METRO and BART. The other reasons I spend money is the fact that the Pardee Building has 5 used bookstores under one roof (unique in the Bay Area) and it and Delauers are within a block of the BART station. If the Pardee Building bookstores were relocated separately and/or more than two or three blocks from the BART station, I would not spend as much money. Consider the fact that in the same six month period that I visited the Pardee building bookstores 8-10 times I have visited Holmes Bookstore once.

If the City can build a new administration building and the Pardee Building bookstores can remain in operation at their present location, Oakland has an opportunity to market this unique regional resource, at the hub of the BART system, and attract hundreds of people like me. That would generate hundreds of thousands of dollars in retail sales. An attractive outdoor cafe in the old New York Fabric storefront of the Pardee Building could make the 12th street BART station a major destination for the thousands of Bay Area book collectors like me on weekends and during weekday lunch hours.

What I have just described meets a number of the City's objectives as outlined on page S-2 of the DRAFT EIR, particularly number 5, "Encourage economic redevelopment of the district around City Hall".

One way to achieve objective 6, "Maintain architectural and visual prominence of City Hall" is to create a separation between the old City Hall and the new administration building. The new building envisioned in alternative 1, wrapping around the Plaza Building will not accomplish this.

Preserving most if not all of the Pardee Building will create enough of an historic streetscape along San Pablo Avenue to create the architectural and visual relief needed to let the old City Hall (and San Pablo Avenue) breath, so to speak.

EIR

Throughout the document, i.e. Chart on Page S-2, Impact LAND-2 on Page 277, etc., it is stated that demolition of the Pardee Building and displacement of the bookstores on this site, is a less than significant impact. **THIS IS SIMPLE NOT THE CASE** as I hope I have conveyed in the above description of my own purchasing habits. Used bookstores are one form of retail that depends upon a certain critical mass or economy of scale for success. For instance, the area around 16th and Valencia in San Francisco contains four bookstores within one block. I and hundreds of other shoppers know we can find what we are looking for at one of the four on any given trip.

2
Cont.

The Pardee Building is unique in its having five bookstores under one roof, less than a full city block from BART. Once these bookstores are separated or moved further from BART, this unique retail resource will be lost and a very significant economic and cultural resource will be lost.

ALTERNATIVE 6. The reasons for rejecting this alternative have to do with a semantic description that one could easily interpret a different way. If you connect the building "systems" in both the Dalziel portion of the building and the portion built on the parking lot behind City Hall at the basement level and through several sky bridges on the second floor (and higher floors) these two "buildings" could function as one. Then you would have two sites instead of three and plenty of room for one stop permitting.

3

Another consideration in favor of ALTERNATIVE 6 is the fact that the rectangular shape should allow for a layout that gets more direct light and window space for offices, keeping darker interior space available for circulation and building systems.

Finally, I believe the EIR needs to address potential public opposition. I believe a majority of the growing Coalition supporting the City of Oakland's position on the new Kaiser Medical Center will be joining Oakland historic preservation and small business interests in supporting ALTERNATIVE 6 and opposing the City's present preferred alternative, ALTERNATIVE 1.

4

We intend to lobby heavily through the local political process and the federal Section 106 historic preservation environmental review process to convince everyone that ALTERNATIVE 6 makes far more sense in creating a healthy

5

DRAFT EIR Comments

Page 4

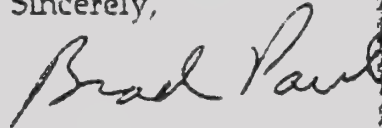
economy for downtown Oakland than the narrow, short sighted ALTERNATIVE 1. Unfortunately, many of us were not aware of the deadline for EIR comments or the date of the public hearing but we will be communicating our concerns over the coming weeks.

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Cont.

Finally, regarding the "one-stop" permitting center so frequently referred to, I would like to see a chart of how many square feet are currently used by various city departments who will be involved in this center as well as a discussion of how much space is used in other nearby jurisdictions for their "one-stop" permit centers, like the BBI/City Planning Center in San Francisco.

6

Sincerely,



Brad Paul
35 Hartford St.
San Francisco, CA 94114
(415) 554-0240

Letter E (Brad Paul)

- 1) The Draft EIR/EIS is not inadequate in its treatment of Alternative 6. The document fully discloses the potential environmental impacts of Alternative 6. Please see also the response to Comment E-3, below.
- 2) For a discussion of effects related to relocation of the bookstores in the Pardee Building, including potential economic impacts, please see the response to Comment C-1, p. 60.
- 3) Generally, the commenter is expressing a preference for Alternative 6 (Taldan/Dalziel/Clay Street Garage). Please see the response to Comment D-2, p. 67, for a discussion of the process by which the project alternatives will be reviewed by the decision-makers. As noted in that response, the Draft EIR/EIS analyzes the potential environmental effects of the alternatives; the information in the Draft EIR/EIS and this Final EIR Addendum will be used in conjunction with other information in the project approval process. The Oakland City Council, as the City decision-making body, will have the responsibility for comparing alternatives both on environmental and operational grounds and selecting one alternative (including, potentially, the No-Project Alternative) for approval.
- 4) The Draft EIR/EIS addresses issues of public controversy, in particular the potential effects on architectural resources, in Section VI.D.1 on pp. 280-296 of the Draft EIR/EIS, and urban design and visual quality, in Section VI.D.3 on pp. 301-332 of the Draft EIR/EIS.
- 5) The Draft EIR/EIS was made available to the public by the City of Oakland on July 8, 1994. A newspaper advertisement noting the document's availability was published in the Oakland Tribune on July 14, 1994. As is required under CEQA, the document was transmitted to the Governor's Office of Planning and Research (State Clearinghouse) and to the federal Environmental Protection Agency. A notice of the document's availability was published in the Federal Register on July 15, 1994, to initiate the 45-day federal review period. Comments were accepted on the Draft EIR/EIR through August 29, 1994, and were again accepted during a supplemental 15-day comment period ending November 18, 1994. (As noted in Chapter I, Introduction, of this Final EIR Addendum, federal involvement with the City Administration Building project has been terminated, and no Final EIS will be prepared.)

- 6) As noted in the response to Comment D-2, p. 67 of this document, the Draft EIR/EIS does not address the operational characteristics of the various alternatives except to the extent that the project sponsor has rejected one or more alternatives as not meeting the project objectives. The following is provided for the reader's information. A comparison between space currently occupied by City departments that would be attached to the one-stop permit center and that proposed would not be valid, because City offices are currently located in less-than-favorable settings as a result of the dislocation caused by the 1989 earthquake and subsequent urgent need to obtain whatever leased space that was available. In some cases, City departments occupy more space than is needed; in other cases, less. The proposed one-stop center would itself occupy about 11,000 net square feet (nsf) and would include a staffed information counter, a library of reference materials, including public information handouts, and a series of largely self-service computer terminals that would provide zoning, building code, and related information. An additional approximately 20,000 nsf (about 31,000 nsf total) would be devoted to more than half of the Office of Planning and Building and Fire Prevention and Fire Department plan check staff whose ready accessibility would aid in processing of permits and responding to citizen inquiries. Regarding the need for large floor plates as part of the project, it should also be noted that, as stated on p. 4 of the Draft EIR/EIS, another of the City's objectives is to avoid, as much as feasible, splitting departments between floors. According to City staff, with the preferred alternative, only the Office of Planning and Building and the Office of Public Works would require more than a single floor. Comparison to other jurisdictions would not necessarily be relevant, since operating procedures and legal and code requirements and the number of public inquiries could be substantially different. The one-stop center proposed as part of the project would be designed to serve the needs of Oakland citizens, business people, and City staff.

STATEMENT
OAKLAND PLANNING COMMISSION
August 24, 1994



Subject: Public Hearing on the Draft Environmental Impact Report (EIR) Draft Environmental Impact Statement. City of Oakland Administration Building(s) Item: EIR92-7, Planning Commission Agenda August 24, 1994.

475 14th Street
Oakland, CA 94612-1903
Telephone: 510/874-4800
FAX: 510/839-8817

Chairman Joe De Luca and Members of Oakland Planning Commission:

Thank you for giving me the opportunity to appear before you tonight on this most important project for the City of Oakland. I am Mary Warren, Chairperson of the Board of Directors of the Oakland Chamber of Commerce.

We have completed the review of the Draft Environmental Impact Report/Environmental Impact Statement and find that all significant issues relative to the evaluation of the alternatives have been addressed along with a detailed analysis and mitigation measures.

We concur with the finding that the proposal for a City Administration Building(s), and the reoccupancy of City Hall in early 1995, will allow the city offices to be relocated to a central core of city-owned properties providing future economies for the operation of the city government. The Chamber is particularly pleased with the requirement by the city to incorporate ground floor retail use in all of the proposed new buildings as well as in the rehabilitation of the Rotunda Building, all of which are a part of the City Hall Plaza Redevelopment Area.

We suggest that in reference to Kahn's Alley that the design-build teams have an opportunity to re-design the alley as a retail arcade, which has historically been successful in Europe, and more recently in the United States such as the Crocker Galleria in San Francisco. There should be flexibility to provide space for a future addition to the Rotunda, in order to mitigate the narrow floor plate on the south side of the Rotunda building. Another consideration should be a better alignment of Kahn's Alley with 15th Street at Broadway.

We concur with the finding to not consider a no-build project alternative, as well as to not consider the issue that was raised during the scoping session of alternative uses for the existing buildings on both the Taldan and Dalziel sites. We believe that neither alternative would meet the objectives of the city to provide a modern, functional and efficient administrative facility in city controlled properties to meet the needs of city government administration including the "one-stop" permit center for the public.

The evaluation of the demolition and construction program was complete. We suggest that prior to the start of construction that a constructive program to mitigate short term noise to adjacent property owners be developed, and wherever possible, to limit noise producing activities during the normal office and commercial business hours.

STATEMENT

Oakland Planning Commission

August 24, 1994

Page 2

It is our observation that the historic concerns have been fully identified. We applaud the careful evaluation that has been made for the preservation of the Broadway Building and the Plaza Building, and the retention of the facade of the Pardee Building. We believe that the mitigation measures are sufficient and will be carefully followed by the design-build teams for their proposed designs, and later in the construction of the new buildings, incorporating the elements as outlined in the report.

We feel that the preferred alternative will provide historic and cultural benefits that are not mentioned in the EIR/EIS Report. We also believe that through these efforts the property owners in other nearby buildings will consider preservation improvements to their properties, and that the city will do likewise with their city-owned properties within the City Hall Plaza Area. The traditional historic city center area will continue to evolve as a district as a whole with a focal point being the redesign of the City Hall Plaza-the Frank Ogawa Memorial Plaza -centered by the historic oak tree, the symbol of our City.

In summary we believe that the selection of alternative one by the City of Oakland identifying both the Taldan site at Broadway and 14th Streets next to the Rotunda Building, and the Daziel site at 15th Street north of the present City Hall, will stimulate private development eastwardly to Broadway and northerly from 16th Street along San Pablo and Telegraph Avenues to link the proposed opportunities for new development on the Broadway, Telegraph, & San Pablo corridors at 20th Street.

Thank you for giving us the opportunity to appear before you on the Environmental Impact Report/Environmental Impact Statement for the proposed Oakland City Administration Building(s). With the exception of our comments above, we find that the EIR/EIS adequately and fully discloses potential impacts of the project as proposed. We urge the Planning Commission to direct the consultant to prepare the final EIR/EIS document and to certify it as adequate.

We look forward to working with the City in subsequent review and approval of the project and other actions needed to make this project a reality within the time frame set by the City of Oakland. This project will provide significant savings for the operation of the city government, but as importantly, it will serve the public and will send a specific, dramatic message to all property owners and future investors in our City that Oakland is moving forward to the 21st Century.

Thank You.

1
Cont.

Letter F (Mary Warren, Chairperson, Board of Directors, Oakland Chamber of Commerce)

- 1) The commenter's position in support of the project is noted. It should be noted that, while the Rotunda Building would be included in development of Alternative 4, the project would not include rehabilitation of the Rotunda Building if Alternative 4 were not selected. Please see also Chapter II.B, Addenda to the Draft EIR/EIS, for new Mitigation Measure HIST-6b, Rotunda Building rehabilitation, which is added to p. 296. (As noted in that measure, the City plans to develop the Rotunda Building as a downtown education center; this would be a separate project from the City Administration Building.)

The commenter's assertion of a "finding not to consider a no-build project alternative" is incorrect. Alternative 7, the No-Project Alternative, is fully analyzed in the Draft EIR/EIS, and will be considered by the City Council as with each of the other alternatives. As noted by the commenter, the "Existing Buildings on Taldan and Dalziel Blocks Alternative" was considered and rejected by City staff; a revised version of that alternative is included in this document in Chapter II.B, Addenda to the Draft EIR/EIS.

Regarding construction noise, Mitigation Measures NOISE-1 and NOISE-3, pp. 211 and 213, respectively of the Draft EIR/EIS, would reduce the impact of construction noise to a less-than-significant level.

Regarding the Plaza Building, that building is not part of the City Administration Building project. As noted in the response to Comment A-2, p. 49 of this document, the City plans to rehabilitate the Plaza Building as a separate project, which may require environmental review separately from this project.

Retention of the Pardee Building facade, which is mentioned by the commenter, would occur only with Alternative 6 (Taldan/Dalziel/Clay Street Garage) and Alternative 7 (No Project) of those alternatives analyzed in Chapter VI of the Draft EIR/EIS, since both alternatives would retain the Pardee Building. (The "Existing Buildings on Taldan and Dalziel Blocks" Alternative, considered and rejected as described in Chapter IV of the Draft EIR/EIS and revised in this Final EIR Addendum, also would retain the Pardee Building.) The preferred project as currently proposed would include a setback on the San Pablo Avenue frontage of the Dalziel block at approximately the height of the existing Pardee Building to recall the Pardee Building facade.

IV. Written Comments and Responses

Comments regarding Kahn's Alley and in support of Alternative 1 are noted. It should be emphasized that the City has not yet selected any of the alternatives analyzed in the EIR.



PORT OF OAKLAND

August 25, 1994

RECEIVED

AUG 29 1994

Ms. Anu Raud
Environmental Review Coordinator
City of Oakland
Office of Planning and Building
1330 Broadway, Suite 310
Oakland, CA 94612

CITY PLANNING DIVISION
ZONING DIVISION

Subject: *Environmental Impact Statement/Environmental Impact Report for the Oakland City Administration Building(s).*

Dear Ms. Raud:

The Port of Oakland has reviewed the Environmental Impact Statement/Environmental Impact Report for the above-referenced project. The Port of Oakland has the following comments:

Cumulative Traffic Impacts: In its analysis of cumulative traffic impacts, the EIS/EIR states that "the project would increase traffic at local intersections in the Project area vicinity in 2000. This would not be a significant impact." (Impact TRAF-2, page 358). The EIS/EIR defines a significant impact to traffic as "any addition of traffic that causes an intersection with an existing or future base (ie. without the Project) LOS D or better to drop to a LOS E or F." (page 350) On Table 33: *Year 2000 Intersection Level of Service - PM Peak Hour*, the Broadway/5th Street intersection is shown as operating at LOS D; the Broadway/6th Street intersection is shown as operating at LOS B.

This cumulative impact analysis for the Broadway/5th-6th Street intersection, however, is not consistent with an earlier (1992) traffic analysis prepared by Korve Engineering which identified significant cumulative impacts.¹ That traffic study concluded: During the PM Peak Hour under short-term cumulative conditions with Amtrak, Broadway/5th-6th would operate at LOS F.

¹ Korve Engineering, Inc., *Amtrak Oakland Station Relocation Plan, Draft-Final Circulation Analysis*, January 22, 1992.

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1

Under long-term cumulative conditions with Amtrak, Broadway/5th-6th would decline to LOS F.

Please clarify this discrepancy in the analysis of significant cumulative impacts to the Broadway/5th-6th Street intersection and indicate what mitigation measures are identified in the EIS/EIR to reduce these impacts.

1
Cont.

The Port of Oakland appreciates the opportunity to comment on the Oakland City Administration Building(s) EIS/EIR. If you have any questions regarding the issues presented in this letter, please contact Richard H. Sinkoff, Assistant Port Environmental Planner, at (510) 272-1182.

Sincerely,



Loretta Meyer
Port Environmental Assessment
Supervisor

Letter G (Loretta Meyer, Environmental Assessment Supervisor, Port of Oakland)

- 1) The cumulative impact analysis referenced by the commenter, included in a 1992 circulation analysis of the proposed Amtrak Oakland Station relocation, was based on projections of substantially more development occurring in and near downtown Oakland than is likely to occur by the year 2000. The Amtrak report, based on data gathered in 1991, included in its cumulative analysis trips that would have been generated by several projects that are no longer considered reasonably foreseeable by 2000, the year analyzed in the City Administration Building Draft EIR/EIS cumulative transportation analysis. The Amtrak report also included, in its list of future development, several projects that were complete by 1993, when traffic counts used in the City Administration Building analysis were conducted.

Completed and fully or substantially occupied projects included as future projects in the Amtrak analysis include Preservation Park at 13th Street and Martin Luther King Jr. Way; Victorian Row and 9th Street and Broadway; Pacific Renaissance Plaza (Phases I and II) at 10th and Franklin Streets; 1111 Broadway (APL Building); the Caltrans building on Grand Avenue in Kaiser Center; the Lake Merritt Tower in Kaiser Center; and the Frank G. Mar Housing development at 1220 Franklin Street. Because these projects were occupied by 1993, trips generated by these projects were included in the City Administration Building Draft EIR/EIS traffic counts as part of the existing setting. The Federal Office Building at 13th and Clay Streets, included in the Amtrak cumulative analysis, was included in the City Administration Building Draft EIR/EIS in the 1997 project scenario, as the buildings were not occupied at the time the traffic counts were conducted (see pp. 350-352 of the Draft EIR/EIS). The Draft EIR/EIS also includes the proposed State Office Building on the site of Alternative 3 in its cumulative analysis (see pp. 350-352).

Among the projects no longer considered reasonably foreseeable by 2000 are seven sites in the City Center Redevelopment Area totaling about 1.6 million square feet of office space and about 70,000 square feet of retail space; Phase III of the Pacific Renaissance Center; the so-called "Hotel Two" at 12th Street and Broadway; and an approximately 750,000-sq.-ft. office tower and hotel at Kaiser Center (the so-called "Tower 2"). Also not considered reasonably foreseeable by 2000 are two office-retail development sites on Port of Oakland property at Jack London Square that, while they are included in the Port's Master Plan, are inactive at present.

As stated on pp. 351-352 of the Draft EIR/EIS, the transportation analysis incorporated an annual growth rate of 0.3 percent in traffic at the study intersections, based on projections by the Association of Bay Area Governments (ABAG), for both the project (1997) and cumulative (2000) analysis years. This projected growth in traffic would account for expected development in the greater downtown area that could affect the study intersections. Because of the status of the projects included in the 1992 Amtrak analysis, the cumulative forecast of that report is no longer considered accurate, and the cumulative analysis in the City Administration Building Draft EIR/EIS more accurately reflects expected intersection operations in 2000.

29 July 1994

File No: 94-AL-54E

re: Oakland City Administration Bldg. EIR/EIS

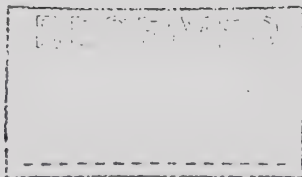
Dear Mr. Amaglio:

Our office has no additional comment on the above
report (see pages 796-301 & 124-134). However,
thank you for your continued interest in protecting
cultural resources.

Sincerely,
Leigh Jordan
Leigh Jordan
Assistant Coordinator

**HISTORICAL RESOURCES FILE SYSTEM
NORTHWEST INFORMATION CENTER
FOUNDATION CENTER, BUILDING 300
SONOMA STATE UNIVERSITY
ROHNERT PARK CA 94928**

Mr. Sandro Amaglio
Regional Environmental Officer
Federal Emergency Management
Agency - Region IX
Building 105
Presidio of San Francisco
San Francisco CA 94129



IV. Written Comments and Responses

Letter H (Leigh Jordan, Historical Resources File System)

- 1) Comment noted. This comment does not address the adequacy of the Draft EIR, and no response is necessary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

I

August 22, 1994

Sandro Amaglio, Regional Environmental Officer
Federal Emergency Management Agency, Region 9
Presidio of San Francisco, Bldg. 105
San Francisco, CA 94129

Dear Mr. Amaglio:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the project entitled **Oakland City Administration Building**, in Oakland, California. Our review is provided pursuant to the National Environmental Policy Act (NEPA) [42 USC 4231 et seq.], Council on Environmental Quality (CEQ) regulations [40 CFR Parts 1500-1508] and Section 309 of the Clean Air Act.

The City of Oakland proposes to construct a new City Administration Building(s) to replace office space lost as a result of the 1989 Loma Prieta earthquake. The project includes a planning/building services center and retail space. The DEIS examines seven alternatives, including construction of one, two or three new office buildings and another alternative that would retain current conditions in which the City offices are located in existing downtown buildings.

Based on our overall review, we have assigned the DEIS a rating of **LO (Lack of Objections)**. We note however, that the document does not clearly explain the requirements under the Clean Air Act that FEMA must comply with regarding conformity to the State implementation plan. Pursuant to the requirements of Section 176(c) of the Clean Air Act, 42 U.S.C. Section 7506(c), Federal agencies are prohibited from engaging in or supporting in any way an action or activity that does not conform to an applicable State implementation plan. Conformity to an implementation plan means conformity to an implementation plan's purpose of eliminating or reducing the severity and number of violations of the national ambient air quality standards and achieving expeditious attainment of such standards.

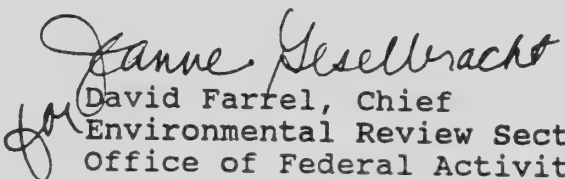
EPA has promulgated regulations at 58 Federal Register 63214 (November 30, 1993) implementing Section 176(c). Among other things, these regulations establish de minimis levels for actions requiring conformity determinations, exempt certain actions from conformity determinations, and create criteria and procedures that Federal agencies must follow for actions required to have

conformity determinations. FEMA should review these regulations and discuss their applicability in the FEIS. If you have any questions regarding these or other conformity requirements, please contact Bob Pallarino of the EPA Air and Toxics Division at (415) 744-1212.

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We appreciate the opportunity to review and provide comments on the DEIS. Please send one copy of the Final Environmental Impact Statement to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please feel free to contact me at (415) 744-1574, or have your staff contact Edward Yates at (415) 744-1571.

Sincerely,


David Farrel, Chief
Environmental Review Section
Office of Federal Activities

MI# 2240: oakadmin.dei

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommend for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

IV. Written Comments and Responses

Letter I (David Farrel, U.S. Environmental Protection Agency)

- 1) Because FEMA's involvement with the City Administration Building project has been terminated (see Section I.B. of this Final EIR Addendum), the project involves no federal action subject to the Clean Air Act requirements for conformity with the State Implementation Plan.

Oakland City Planning Commission
Attention: Anu Raud, Environmental
Review Coordinator
Oakland City Planning Department
421 14th Street, 1st Floor
Oakland, CA 94612

CEIV August 29, 1994

AUG 29 1994

CITY PLANNING COMMISSION
ZONING DIVISION

J

re: COMMENTS ON DRAFT EIR/EIS FOR CITY ADMINISTRATION BUILDING

Dear Ms. Raud and Commissioners:

I am very familiar with the area around Oakland's City Hall Plaza, and I care deeply about its future. So it has naturally been with great interest that I have read the recently produced Draft EIR/EIS regarding a new City Administration Building, or Buildings, to be constructed there. Within that lengthy document I have found much valuable information and many good ideas--but also various omissions, quite dubious proposals, and other problems. I wish to make the following comments.

Dalziel Block

The Draft EIR/EIS fails to mention (even in its list of "alternatives not selected for further study") a rather obvious potential solution concerning the Dalziel block that would seem to be reasonable and to substantially reduce environmental damage.

In this solution, a new structure about seven stories high would cover most of the block but the Plaza Building and portions of the Dalziel and Pardee Buildings would be retained. The saved portions of the Dalziel and Pardee Buildings would be seismically retrofitted and their floor plates and/or corridors would be connected with those of the new structure--just as the City is proposing for the Broadway Building and adjacent construction on the Taldan block. In the case of the presently T-shaped Dalziel Building, the southern 40 or 50 feet would be saved: in other words, the T's entire crosspiece that so handsomely fronts on 15th Street. (Optionally the stem of the T might also be saved, but I suspect that doing so would pose much more difficulty.) In the case of the currently sprawling Pardee Building, at least its southern 40 or 50 feet would be retained: that is, the portion right along 15th between the Dalziel Building's crosspiece and the Plaza Building. If possible, it would be nice to also save the Pardee's first four bays immediately north of the Plaza Building, at the visually critical corner of San Pablo Avenue. And it might be desirable to restrict the new structure's southwesternmost part (specifically its portion, at 15th and Clay Streets, which would be directly west of the Dalziel Building's crosspiece) to the same height as that of the Pardee Building.

As a result of this solution, the Dalziel block's appearance as seen from the draft's viewpoint 3 would of course resemble Figure 75 (on page 317) much more closely than Figure 76.

The Dalziel Building itself is either six stories high or six stories plus a mezzanine. And I suspect that City space computations for the new structure reflect some allowance for potential setbacks. Indeed some graphics in the draft such as Figures 49 and 76, though not meant to be taken too literally, actually show two sizable setbacks on the block's 15th Street frontage. So retaining portions of the Dalziel and Pardee Buildings (and

incorporating them functionally into the Administration Building) wouldn't necessarily imply much reduction in potential City office space. And any resulting loss might be compensated for by somewhat increasing the height of the new structure's Clay Street side, where height would be less obtrusive—or by using for City purposes the upper floors of the Plaza Building.

In terms of preservation and urban-design philosophy, the partial retention that I have suggested for the Dalziel and Pardee Buildings would seem to be acceptable in the particular circumstances. I am aware of the perils of "facadism," which in many projects elsewhere has left only a pitiful and obviously paper-thin remnant of the old, pasted awkwardly onto a bulky and alien new structure. But that shouldn't be the effect here. The T-shaped Dalziel Building's distinguishing facade and presumably its lobby are in the crosspiece portion that would be saved to its historic depth, and this depth would be sufficient to let the crosspiece in itself read as a whole building. The situation with the Pardee Building, most of which would be demolished, is of course more problematic. However, I believe that saving even just its southernmost 40 or 50 feet would be quite justifiable. This depth would make visual sense in relation to the Plaza Building and the Dalziel's crosspiece. And sandwiched as it is between two taller structures and distant as it is from the Pardee Building's facades on other streets, the 15th Street end of the Pardee has always been rather liable to be perceived by passersby as a separate structure. It may well also be visually appropriate to save (as suggested earlier) the Pardee's first four bays north of the Plaza Building, if enough depth can be retained behind their facade.

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The solution outlined above would preserve all the historic best features along the block's crucial side facing the City Hall. It would help to conserve the Downtown District's alternating pattern of high and low buildings, a characteristic which the Draft EIR/EIS repeatedly calls distinctive. It would help to minimize potential isolation of the Downtown District's northwest corner, a problem which the draft repeatedly worries about. It could even serve recreational needs through provision of usable rooftop space. For example, the roof of the Pardee Building's southernmost portion might be made into a pleasant and convenient outdoor sitting area for City employees and visitors, or perhaps a play area for the planned child-care center.

In general the solution might be regarded as an environmentally superior variant of the draft's Alternative 1. But it should also be considered as suggesting possible variants of the draft's Alternatives 2 and 6. For instance, Alternative 6 might well be modified so as to retain and utilize the crosspiece of the Dalziel Building.

Kahn's Alley

The Draft EIR/EIS fails in several ways to address adequately the matter of Kahn's Alley.

First, although it discusses the various adjacent buildings individually, it really doesn't recognize and describe the totality of the alley and its important role within the cityscape. In fact, the alley offers a memorable and unique visual experience. I am using the present tense here even though the alley has been blocked at both ends by temporary barricades, presumably due to safety concerns involving earthquake damage to adjoining buildings. I am doing so because the barricades could readily be removed if the safety problems were remedied, because even now you can look over the barricades and thereby enjoy some of the former visual experience, and because the alley's right-of-way and of course its old three-dimensional channel of space

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still exist. So let's imagine Joe Pedestrian strolling through Kahn's Alley toward City Hall Plaza. As he starts in from Broadway he can't see far ahead, except that if he enters closely beside the wall on the Rotunda Building side he may notice a sliver of the City Hall. But farther along he finds dramatic change, as the still-tightly-confined alley abruptly bends to take direct aim at the City Hall's monumental entrance, which in turn lies just beyond an open pool of light hinting at the spacious plaza that he will soon encounter. Thus we have a fine sequential experience—of concealment and mystery followed by sudden yet beautifully focused disclosure—in which the alley's very narrowness seems to play a vital role. In addition to providing one of the most intensely enjoyable ways to view the City Hall, the narrow passageway serves as a valuable foil to the wide plaza. All in all, Kahn's Alley is the sort of feature that lovers of townscape rave about when they find it in European cities. Even at home in Oakland, the alley's virtues haven't always been as neglected as they are by the Draft EIR/EIS. See what was said about the alley in the attached pages which I have copied from the excellent and still-pertinent report entitled Design Resources in the Oakland Central District, published in 1963 by the City Planning Department.

Second, the Draft EIR/EIS is unclear about specifically what would be done to Kahn's Alley. The textual description for each of Alternatives 1, 4, 5, and 6 (the ones that would put City office space on the Taldan block) contains the statement that "As part of the new building on the south side of Kahn's Alley, this alternative would widen Kahn's Alley to provide a more visible link between Broadway and City Hall Plaza." But how much wider would the alley become, and what is really meant even by the word "widen"? Unfortunately the draft has no graphics of present or future views looking directly into or from the alley. The San Pablo and Broadway ends can be seen obliquely within the "visual simulations" of, respectively, Figures 72 and 74. (Incidentally, the captions for both figures fail to mention Alternative 6.) But quite strangely, in those simulations of the future the discernible portions of the alley look narrower than they now are. And the oblique aerial simulations in Figures 66, 69, and 70, within which the whole top of the new structure beside the alley can be seen, could be read as implying that the alley would be similarly narrow throughout its course from San Pablo to Broadway. All those figures do bear a disclaimer that "Visual simulations illustrate generalized building masses only and are not intended to depict building design...." Yet one would hope that even that kind of simulation would convey the important point of whether or not a public right-of-way would be widened. Another source of uncertainty is the textual description of Alternative 4, which says that "...a walkway and/or part of the new building could connect selected floors of the new Taldan-property building to the Rotunda Building, across Kahn's Alley...." Now let's examine the following wording which is included in the set of "City Hall Plaza Redesign" recommendations spelled out by the draft's Appendix E:

...Kahn Alley should become an extension of the Plaza: Except for over-projecting portions of upper stories of any structures built adjacent to Kahn Alley (15th St. between San Pablo and Broadway), Kahn Alley should be widened sufficient to visually attract pedestrians to the Plaza from Broadway. The Broadway portal to Kahn Alley should remain strictly a pedestrian way and clearly be an extension of the Plaza to Broadway.

Does that imply that the "widening" would really just mean providing along the new structure's northern side something like a continuous ground-level arcade, above which the upper stories would extend out to the alley's present edge? Would the "over-projecting" be optional or required? Would it occur all along the alley or just in some portion? Would it occur only under Alternative 4? On the other hand, since Appendix E doesn't specify

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that any of the above-quoted wording would be limited in applicability regarding the draft's various "build" alternatives, would the alley somehow get widened even under Alternatives 2 and 3? All of this should be clarified.

Third, the draft doesn't offer any alternative that would build City office space on the Taldan block but not widen (in some manner or other) Kahn's Alley. This is a significant omission because widening could easily spoil precisely what makes the alley such a special piece of townscape. Even if the present space-defining structures along the alley's southern side must be torn down, it should be feasible to design the new structure so as to essentially restore the alley's subtle geometry and spatial experience. Widening is of course far from being the only available way to make the alley more attractive for pedestrians or to convey an affinity with City Hall Plaza. Other things such as paving, light fixtures, or art works could well suffice, while avoiding destruction of the alley's uniqueness.

Fourth, the draft doesn't deal adequately with the subject of land use along the alley. Its descriptions of Alternatives 1, 4, 5, and 6 say that "Ground-floor retail space would be included on Broadway and San Pablo Avenue" but say nothing about such space for Kahn's Alley. For comparison, see how Figure 36 on page 41 of the Oakland Central District Plan which was published in 1966 proposed that both sides of the alley should be "Primary Building Frontage." That page's text explained that "Along the primary frontages, ground-floor establishments should be restricted almost entirely to retail stores and certain consumer services which can derive the greatest benefit from direct pedestrian access and which can hold the shopper's interest." I can remember when there were one or two ground-floor commercial establishments located somewhere along the alley's south side, including a lunch counter where during one period I often purchased takeout food. But in general the alley has long been handicapped by lack of relevant adjoining activity, and by the forbidding nature of the big blank wall with which the Rotunda Building lines the alley's north side. And the resulting lack of a sense of surveillance has contributed to security problems, whether real or assumed. Even if the alley were widened (and perhaps especially if that meant creating a covered passageway on the side), many people might still be hesitant about walking through it. In order to make pedestrians feel safer in the alley, as well as to attract more of them to it, ground-floor land use is a critical concern. Perhaps it would be appropriate for some of this to be commercial and some of it governmental or institutional. But there do need to be, at ground level along the alley itself, enough windows with people visible behind them and enough doors with lots of people going in and out.

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Fifth, the draft fails to present sufficient measures to mitigate the drastic changes that could impact Kahn's Alley. Yet many things could be done in this regard. Here are a number of ideas, some of which I've already touched upon:

1. The City should establish a basic design principle that would call for making Kahn's Alley more attractive to pedestrians while also preserving or recreating the essentials of the alley's unique and dramatic spatial experience.
2. That principle probably implies that the alley shouldn't be widened at all (at least at the level of the lowest three or four stories of the adjacent new structure)—except possibly to the extent that it might be demonstrated convincingly, through detailed visual simulations, that having a ground-level arcade under the new structure's northern edge would not impair the alley's unique qualities. One might postulate a solution that would leave the alley's middle portion narrow while widening the ends, but that concept seems dubious.

3. It might be desirable to set back at least portions of the new structure's upper four stories—above the approximate height, that is, of the existing Woodward and Money Back Smith Buildings. This could reduce the new construction's apparent "chasm"-creating effect as displayed by Figures 66, 69, 70, 72, and 74.
4. Indeed, one possibility for such an upper-story setback would involve saving some or all of the Woodward structure and integrating it into the City Administration Building.
5. The temporary barricades should be moved aside long enough to let a videotape be made that would carefully document the actual eye-level experience of walking into, along, and out of the alley, in both directions. The architects involved in the design-build competition for the new structure should use the tape as a baseline, and test their evolving designs against it to ensure that they would preserve or recreate the alley's essential good qualities.
6. The alley might have wall-mounted light fixtures that would be otherwise similar to pedestrian-scale fixtures to be installed in City Hall Plaza.
7. If the plaza will have some distinguishing type of paving, this could be extended right through the alley, and even used for part of the adjoining Broadway sidewalk.
8. Bridging the alley's Broadway end there could be an ornate open-metalwork gateway which, through symbols or referencing motifs, would hint that the pedestrian is entering a special precinct.
9. The alley's San Pablo end shouldn't be bridged, because that would mar the critical clear vista from the alley's midpoint toward the City Hall. But it would be nice for the alley's entrance to be accented somehow as seen from the plaza, guiding people into the alley and toward the shops of Broadway. The slightly projecting end bay at the Rotunda Building's southwest corner already provides some of the needed quality. So one idea could involve having the new building's nearest corner, across the alley, echo that bay in some manner.
10. The ground floor of the new building should contain significant commercial space having its main customer access from inside the alley. This should include at least one establishment that would be open during evening hours. For instance, there might be a good restaurant that would draw patronage from people taking evening courses at the planned downtown educational center in the Rotunda Building or going to night meetings in the City Hall.
11. In addition, a major entrance lobby for the new building's City office space might well be placed about midway along the alley. This should help to give the alley a sufficient pedestrian flow and sense of activity. And the lobby might prominently feature a desk, and/or even outward-pointing surveillance cameras, for a nighttime security guard one of whose duties would be to check on the alley.
12. Or security could be promoted by actually locating part of the Oakland Police Department on the new structure's ground floor midway along the alley. This might be a both reassuring and convenient site for a small "storefront" station which would have a community-relations function as well as providing a day and night base for downtown foot-patrol officers.
13. Needless to say, the new structure's northern facade should be designed to provide genuine visual interest to pedestrians.

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14. The Rotunda Building's dreary southern facade should in some manner be embellished, and some windows should be punched through its first story to give to people walking in the alley a sense of the adjoining activity. These measures would be within the City's power even regarding Alternatives 1, 2, 3, 5, and 6 which wouldn't use the Rotunda Building for City office space. The structure is of course owned by the Redevelopment Agency.
15. Similarly, an actual entrance to the Rotunda Building could be created midway along the alley.

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Plaza Building

The Draft EIR/EIS doesn't specify whether the Redevelopment Agency owns the Plaza Building (though I assume the Agency does) and, much more importantly, it doesn't adequately address the potential for earthquake damage to this structure. The draft's Impacts GEO-1, GEO-2, and GEO-3 and their listed mitigation measures concern the Plaza Building only in relation to excavation, trenching, or pile driving for adjacent structures. And otherwise there isn't even implicit identification of potential damage to the building, or steps to prevent it—except for what the reader may infer from Chapter V's description of underlying geology, etc. or from Impact GEO-9's vague mention of possible widespread damage in downtown Oakland. Impacts GEO-4, GEO-5, and GEO-6 and their mitigation measures seem to refer to structures "on the alternative project sites" and thus not apply to the Plaza Building. And Mitigation Measure GEO-9a refers to "development" and "construction" rather than existing buildings. Nowhere in the draft is there any description of the Plaza Building's own condition and strength regarding earthquakes. Even if the structure wasn't damaged by the Loma Prieta event, it may be quite vulnerable to the much greater stress that it will sooner or later get when the Really Big One cuts loose.

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Although the City isn't proposing to put any of its own office employees inside the Plaza Building, it obviously wants this fine historic structure to form in visual terms a key part of the area's intended campus-like ensemble. But in order to ensure long-term retention of the building, and protect the lives of people in and around it, the City must make sure that it either is or is made seismically safe.

Somewhat related to this concern is a curious inconsistency that I've noticed in the draft. On page S-28, which is part of a summary table, there are two different impacts labelled "HIST-4" and two different mitigation measures called "HIST-4." The second of those impacts and the second mitigation measure match wording that appears, and is elaborated upon, in Chapter VI. But the first of those impacts (involving possible indirectly resulting alteration of the Plaza Building) and the first mitigation measure (as to ensuring compliance with the Secretary of the Interior's standards "if restoration and/or renovation of the Plaza Building is undertaken") are matched by nothing to be found in Chapter VI or elsewhere.

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Freight and Passenger Loading

The draft fails to recognize that conflicts between truck loading and pedestrians could occur even under Alternatives 2 and 3. Its listed Impact TRUCK-1 and mitigation measures therefor do address potential conflict with pedestrians in the expanded City Hall Plaza, in case loading access for the Taldan block would involve a surface turnaround at 15th and San Pablo instead of an underground loading dock. However, they are shown as applying only under

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Alternatives 1, 4, 5, and 6. Although with Alternatives 2 and 3 the Taldan block wouldn't have City office space, surely it would have, sooner or later, some substantial uses requiring frequent deliveries. And the draft's pages 10-11 indicate that plaza expansion, involving closure of San Pablo alongside the Taldan block, would occur under all "build" alternatives.

(Incidentally, while page S-30 calls the related mitigation measures "TRUCK-1a" and "TRUCK-1b," page 369 mislabels them as "TRUCK-1" and "TRUCK-2.")

Appendix E's plaza-redesign recommendations are specifically referred to by pages 11 and 331 and seem themselves to be, under all "build" alternatives, part of the project and/or proposed mitigation measures. So it's puzzling how pages 11 and 368 say that freight-loading access for the Taldan block could be either underground or surface but Appendix E envisions just the underground version. If the latter represents only a preference, this should be clarified.

Similarly, it's confusing how pages 13 and 17 say that truck access for the City structure on the Dalziel block would be via Clay Street and possibly 16th Street, and page 28 states that it would be via Clay or maybe 16th, but page 368 mentions only Clay.

Another apparent inconsistency involves the types of vehicles that would be allowed on 15th Street between Clay and San Pablo. Pages 11 and 28 and Appendix E (when read together) seem to indicate that only Mayoral and City Council cars and emergency or official maintenance vehicles would be allowed here. But page 368 seems to say that in at least some cases, large delivery trucks would also be permitted.

I am mystified by Appendix E's statement that "To prevent heavy delivery traffic along 15th Street, only the City Hall Plaza Bldg., and the buildings built on the Taldan Block should be served from the underground street." How could letting additional structures have that underground service result in more trucks using 15th Street? The only reasonable way for trucks to go to or from the tunnel would be via San Pablo Avenue. As page 368 implies, the up- and down-ramps would surface in the middle of San Pablo north of 15th.

And there is inconsistency about passenger loading around City Hall Plaza. Appendix E says that "Only 14th Street should be used for pedestrian drop-off." But that contradicts pages 11 and 368, which envision passenger pick-up and drop-off at the turnaround to be located at 15th and San Pablo.

Bike Parking

The draft's treatment of bike-parking needs is weak in several ways:

1. Page 367's computations of future demand seem to be based roughly on just the existing incidence of bicycle riding. In other words they apparently assume that because only a minuscule percentage of City employees now bicycle to work, only a few bike racks should be provided. But if significantly more (and more conveniently located) racks or lockers were provided, couldn't the percentage of people who bicycle be increased? And for many environmental reasons, isn't this what the City should be trying to do here?
2. Regarding bicycling by City employees, page 367 seems to consider only riding to and from work. But what about parking for "pool" bikes that could be used, during work hours, for City purposes like short errands? This might even reduce space needs for pool-car parking.

3. The analysis refers only to bicycling by City employees and by "visitors to the City Administration Building." What about bike parking for people working in or visiting other downtown buildings? And what about people who would like to bicycle to the kinds of outdoor concerts or other gatherings which Appendix E foresees being held in City Hall Plaza?
4. Similarly, the boldfaced wording of Mitigation Measure PED-1 seems to envision bike parking only for City employees and visitors to the City Administration Building. And it says that such parking merely "could" (not "shall" or "should") be included.

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Page 367's third paragraph says that bike racks "should be in a covered location if outside (to protect from rain)," but in some cases that may not be appropriate. For example, a few racks might be installed near the historic Rotunda Building's Broadway entrance where they would be convenient for short trips such as by messengers, but where a canopy or other cover might be visually obtrusive.

Bike racks should be considered for inclusion within City Hall Plaza. It might be best for these, also, to be left uncovered—especially if they were meant largely for people coming to enjoy fair-weather activities in the plaza itself.

Plaza Amenities

I have these further comments about Appendix E's recommendations on City Hall Plaza redesign:

1. I question the recommendation that "Wood should not be used to provide seating." That seems arbitrary, overstated, or at best premature. Upon further study, wood may very well be found appropriate for at least some of the plaza's seating, or for body-contacting surfaces thereof. With its feel, thermal characteristics, and associations, it arguably would be the most comfortable and popular type of material for outdoor seating. And the idea is to make many people want to sit in the plaza—isn't it?
2. I'm puzzled by the statement that "No drinking fountains are recommended." What's the rationale for omitting this traditional and rather inexpensive amenity? Is there some legitimate health-related concern? Or would fountains be omitted to avoid slaking the thirst of potential cappuccino buyers, or to discourage so-called "undesirables"?
3. I'm worried by the statement that "Large planter boxes...are preferred means of provision for shrubbery and trees in the Plaza areas." Would the "boxes" be tubs or similar containers reminiscent of the mall in some 1955 shopping center? Would they look clunky, or feel too suburban? Would they provide enough depth and width for tree roots? Would it be better for at least some trees to be freestanding, with just a metal grating around them which would be flush with the plaza's main surface?

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Clay Street Garage Site, Etc.

The draft's Alternative 6 (or, as I've suggested above, a modification thereof that would save part of the Dalziel Building) offers several advantages over Alternative 1. Obviously it would spare from destruction all of the Pardee Building. It would impressively reduce the bulkiness of new construction. (Compare the visual simulations in Figures 70 and 81 with those in Figures 66

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and 79.) By demolishing the Clay Street Garage, it would remove the wasteful anachronism of ground-level parking on such a prime site.

It would also seem to offer the potential advantage of direct functional connection with the City Hall. The latter's windowless wall that now immediately abuts the Clay Street Garage would, under Alternative 6, abut a new City office building. So couldn't there be some indoor pedestrian link with the City Hall, and maybe some sharing of support functions like copy rooms and building systems like heating? Pedestrian linkage might involve a corridor going through the City Hall's second story (beneath the Council Chamber), and/or a path across the City Hall's ground-level indoor loading area.

Though this concept of integration with the City Hall comes so readily to mind, the Draft EIR/EIS says nothing at all about it. The idea itself, and whatever factors might affect its practicability, should be discussed by the draft.

And what about the interior remodeling which is being done now in the City Hall? Has that work been designed—or could it still be redesigned—so as to at least preserve the possibility of integration with some future City office building on the Clay Street Garage site?

Speaking of functional integration, the draft should explain whether or to what extent, under Alternative 6, the parking levels on the Dalziel block site would extend under 15th Street and connect with the subsurface parking on the Clay Street Garage site. (Pages 339, 342, and 347 say that parking would extend beneath the street for some unspecified distance, while pages 27-28 say nothing about parking under the street.) The draft might well also explain why the Dalziel site would have two levels of subsurface parking while the Clay Street Garage site would have only one.

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Cont.

Incidentally, if the basement levels of both sites would thus be connected beneath 15th Street, would Alternative 6 really have to also feature a pedestrian bridge above the street? In any case the potential visual effects of such a bridge are naturally of some concern. It would be valuable to do simulations of the bridge and its context as seen by (1) a pedestrian standing in City Hall Plaza looking west into 15th Street and (2) someone on the Clay Street sidewalk looking east along 15th toward the plaza.

The draft should meaningfully discuss the Clay Street Garage site even in relation to options other than Alternative 6. And thought must be given to the broader question of what eventual land use (or uses) would be best for this key site in the interests of the overall physical and functional complex that will include not just the City Administration Building, City Hall Plaza, and the City Hall but also nearby uses like the State Office Building, the Federal Building, and City Square.

One possibility would be to treat the Clay Street Garage as a "reserve site" for future expansion of governmental office space. (Yes, governments have been known to underestimate their space needs.) And in turn this might imply that even if the City chooses the draft's Alternative 1 or 2, the new building on the Dalziel block should be designed so as to allow adding, later on, a pedestrian bridge to possible future City offices on the garage site.

Another possibility would be to replace the Clay Street Garage with a plaza or park, and I gather that there's been some talk about that. However, the idea seems quite dubious. It apparently would be wastefully duplicative of

the other open spaces so nearby. It could divert too much patronage away from City Hall Plaza (which it will be important to keep actively used). It could blur the perceived identity and uniqueness of the real plaza. It would create a historically unauthentic setting for the City Hall, which for several decades was adjoined by a large department store occupying the present garage's site. Even a glance at the western edge of the City Hall's base strongly suggests that it was originally designed with the assumption that it would abut some building, rather than a large open space.

8
Cont.

If Oakland decides not to build City offices on the Clay Street Garage site, the most suitable use here may well be condominiums or other high-quality and high-density, though not high-rise, housing.

Traffic

A close reading of Chapter VI's section on traffic reveals various problems or question marks.

One of them is an inconsistency about City employees' current travel modes. Page 354 refers to "existing data indicating that approximately 40 percent of all City employees in the City Center area travel to work by transit, carpool or another method other than single-occupancy vehicle...." Supposedly that "data" is from the 1993 survey mentioned in page 356's second paragraph. However, the survey results as given by Table 29 seem to imply a figure of 45.5 percent--that is, the sum of what the table shows for its "Public Transit," "Carpool/Vanpool/Buspool," and "Bike/Walk" categories.

It is left unclear whether the office-related "person trip rates" mentioned at the bottom of page 352 and the top of page 354 refer not just to commute (home-to-work or work-to-home) trips by the "employees" at issue but also to (1) errands and other trips by these employees during work hours and (2) some allocable number of trips to and from the City Administration Building by visitors. My guess is that they do, but if so then this should be clarified. If they don't, then the traffic analysis is flawed in this regard.

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Questions are raised by the draft's discussion of how office-related "vehicle trip rates" were derived. Page 354 says that "The ITE rates for employee trips generated by a Government Office Building were reduced by 35 percent to convert the person trip rate to a vehicle trip rate and to account for the high level of transit use anticipated by project employees, based on a...[1993] survey of City employee travel modes...." And the text defends use of that 35 percent factor as "conservative" in light of the survey's alleged "40 percent" finding which I've quoted above, and considering that "studies of other office buildings in downtown Oakland have historically assumed larger shifts to transit or other modes of up to 50 percent." (The text goes on to say that the analysis used an extra 5 percent reduction for Alternatives 4 and 5.) However, as I've pointed out, the "40 percent" figure itself is lower than what Table 29 shows. On the other hand, I would assume that the 1993 survey was about employees' commute trips. So would the modal split be substantially different for other office-related trips (those by City employees during work hours, or by visitors)? Another question is whether the "ITE rates" themselves which were used as the starting point already reflected some adjustment, albeit small, for use of transit, etc. (Some wording near the bottom of page 352 invites this conjecture.) Still another question is whether the traffic analysis adequately took into account the vehicles ridden by such people as carpoolers and transit passengers. In other words, if you decide to use X as the percentage of trips that would be by modes other than single-occupancy vehicle, you don't then just reduce the number of person trips by X percent to get the number of vehicle trips. All these matters call for clarification, and maybe recalculation.

Table 28's "Outbound Percent" figures aren't explained, but I'm especially puzzled by the one for retail space in the A.M. peak hour. Is that 40 percent a mistake?

Incidentally, the table's footnote "b"—which for Alternatives 4 and 5 says that a reduction is reflected in "this" figure—shouldn't be referenced from the employment figures.

The draft generally doesn't seem to consider the traffic effects of (1) displacement of existing activities to make way for the City Administration Building and (2) future occupation by new uses of space to be vacated by the City. As examples of displacement, Alternative 3 would remove several businesses from the Miller Building block and Alternative 5 would squeeze about eight office tenants out of the Wells Fargo Building. As for new uses, page 276 merely remarks that "Privately owned office space currently leased by the City would remain vacant until replacement tenants were located"; but in many cases there might be little or no lag. If there was some rationale for disregarding these displacements and replacements (or if their traffic effects were somehow taken into account), this should be explained.

Oddly, page 356's paragraph on "Trip Distribution" doesn't mention the use, by "trips from the south via I-880," of the off-ramp that feeds into Castro below 11th Street. (And the fact that one of Figure 88's "study intersections" is 11th and Castro may suggest that the study actually did assign some traffic to this ramp.) The paragraph inaccurately describes some ramps as being at "19th Street" instead of 18th, and the word "eastbound" in the third sentence is confusing. The text states that vehicles destined for southbound I-880 were distributed between the 5th Street on-ramp and I-980's "14th Street on-ramp." But considering the actual ramp locations and the fact that much of the relevant parking would be south of 14th, isn't it likely that many of these vehicles would head toward I-980 via 12th Street rather than 14th?

Figure 89 is rather confusing in that it shows by heavy line some but not all of the routes described by page 356. Incidentally, its percentages add up to 101 (without explanation) and the so-called "project site" which it depicts obviously differs from the "project area" defined by Figure 1.

Page 356's first sentence implies the big assumption that the total project-generated traffic increment (including midday and retail trips) would have the same distributional pattern as commute trips by City employees. That assumption is questionable, though it may be justifiable in terms of the magnitudes involved and the lack of data.

I'm puzzled by the statement that "The same directional specific distribution pattern is assumed for transit trips." That can be read as referring to the specific routes which the preceding sentences describe—and which largely do not correspond to actual transit lines.

Auto Parking

The Draft EIR/EIS is very unclear about the quantity, location, and nature of what I'll refer to here as "designated City spaces"—that is, off-street parking spaces designated specifically for personal autos owned by City staff members or for City pool cars. Pages 156 and 366 say that there are now about 300 such spaces and that they're at "lots" in the general area. The draft doesn't reveal the location of the so-called "lots," though I suppose that some of the designated City spaces are in the Clay Street Garage. It doesn't say how many of the 300 stalls are used for personally owned cars—nor what the qualifications or charge may be for such personal use. I wonder whether

some of this is free parking that's really used just for commuting. Pages 156 and 366 seem to say that the existing 300 designated City spaces would all be retained (and maybe even in their present specific locations), except to the extent that Alternative 6 would subtract the number of them that are now in the Clay Street Garage. Pages S-12 and 28 say that Alternative 6 would provide about 160 stalls, but the draft doesn't indicate how many of those might be designated City spaces. Pages S-9, S-10, 13, 17, 19, and/or 363 do say that about half of Alternative 1's and Alternative 2's 235 on-site stalls, or about half of Alternative 3's 250 stalls, would be designated City spaces. And those would seem to be in addition to the existing 300. But the above-cited pages appear to be contradicted by page 364, which can be read as saying that (1) at least some of the present 300 spaces would no longer be City-reserved and would thus become available to the general public and (2) all of the parking below the City Administration Building in Alternatives 1, 2, and 3 would be designated City spaces. So what would really happen?

If the total number of designated City spaces would substantially increase, this is a matter of much concern. Regarding at least the spaces held for City employees' own cars, it can well be argued that their quantity should, if anything, be reduced. As page 363's second paragraph seems to admit, one way to lower parking "demand" is to simply provide less parking.

Page 365 calls for a "Transportation Demand Management Program" but says nothing about what it would involve. I don't know what's in the "trip reduction program" mentioned by page 205, but one element to consider might be free or discount transit passes for City employees.

Pages 363-364 are unclear as to how their parking-demand figures were derived. The draft doesn't say how, or whether, they take into account or otherwise relate to the quantity of designated City spaces. Regarding the parking-demand figures which are described as resulting from the incremental number of "employees," it doesn't say how, or whether, they took into account demand by some proportion of visitors to the City Administration Building. It doesn't explain the basis for the parking-demand figures for retail uses. It doesn't address how net parking demand might be affected by (1) displacement of existing activities and (2) future occupation, by new uses, of space to be vacated by the City. And it doesn't explain how, or whether, the computations of demand for off-street parking actually took into account the supply of on-street parking.

Pages 363-364 don't mention that Alternative 3 would remove the 97 spaces that the site presently contains. Similarly, their calculation of the localized effect of Alternative 6 overlooks the removal of 51 existing spaces on the Dalziel block. On the other hand, that analysis fails to consider the approximately 160 new spaces which Alternative 6 would include. Page 363's third paragraph even states, misleadingly, that Alternative 6 would provide no new parking.

The boldface wording of the draft's Impact PARK-1 doesn't actually read as an "impact" at all. What it's probably trying to say is that under at least some alternatives there would be a localized parking shortfall within the "project area" (as defined on page xii), but none for the larger "project area vicinity."

There's an inconsistency between (1) page 365's statement that a localized shortfall would occur under Alternative 6 and "those alternatives that would provide no new parking" and (2) page 364's indication that a localized shortfall would also result under Alternative 1.

Page 364 discusses whether the Oakland Zoning Regulations would require parking for Alternatives 1, 2, 3, 4, and 6, but fails to mention Alternative 5 in this regard.

Chapter IV's capsule descriptions of the parking impact of Alternatives 4, 5, and 6 (see pages 23, 27, and 29) are quite misleading. They say that parking shortfalls would result but they fail to reflect Chapter VI's conclusion that there would, though, be sufficient parking within the general vicinity.

Some of Chapter V's description of existing curb parking seems erroneous or questionable:

1. Page 156's statement that the total on-street parking capacity in the study area is "approximately 440 spaces" does match the total of 442 that I get by adding up the "capacity" numbers per se which appear in Figure 23. But this total doesn't take into account the various pertinent block faces or portions thereof (such as on San Pablo and Telegraph Avenues between 16th and 17th) where Figure 23 shows by symbol the presence of curb parking but doesn't give the number of spaces. Nor does it reflect whatever capacity there may be along the relevant frontages (such as Clay Street immediately north of 12th, and Broadway's west side just below 17th) where the map doesn't portray the parking situation even by symbol.
2. For some block faces, Figure 23 states a "capacity" number which may be too low. For example, and although I haven't field-checked this, does the north side of 15th Street between Broadway and Franklin really have only five spaces?
3. I haven't checked this either, but I question the map's indication of unmetered parking on 15th east of Franklin.
4. My worry about the accuracy of parking counts is furthered by seeing only one "loading" zone marked on the map. Aren't there really many curbside loading zones within the study area?
5. By the way, Figure 23 bears a note saying "Draft Only...Field Review is Continuing." Are the final results in yet?

Massing and Setbacks

There is unclearness, and some apparent inconsistency, in what the draft says about massing and setbacks for new buildings.

Appendix E observes that the Downtown District has been characterized by prominent corner structures contrasting with adjacent low ones, and it accordingly prescribes a design guideline stated as "Mass new buildings to maintain the prominence of the corner buildings." In response to Impact HIST-3 regarding one such corner structure (the Plaza Building), page 285 says that a large City Administration Building adjoining it could be designed to incorporate elements such as "horizontal and vertical setbacks." In response to Impact HIST-5 concerning general loss of buildings contributory to the Downtown District and construction of noncontributory new structures, page 295 states that design of the City Administration Building(s) could include "de-emphasizing the mass and bulk of the new structure(s) by visually breaking up the building facades through the use of minor setbacks and other three-dimensional features...."

On the other hand, one of Appendix E's design guidelines says that "The primary facade facing the street should be at the sidewalk, not set back, barring other unforeseen requirements"—this being especially important along streets such as San Pablo and 15th—and that "The streetfront facade should be in the same plane as adjacent buildings...." And there's also a guideline which says that

"The streetfront facade could be articulated/modulated, but should not have any major recessions or light wells visible from the street."

The situation could be resolved by making a clearer and stronger distinction here between the lower and upper portions of new buildings:

1. The lowest three stories or so should generally extend right out to the sidewalk all along the street frontage, except in rare special cases. The height to which this rule applied might vary from two to four stories depending on the particular block face and the scale of the present contributory low buildings there.
2. Above that street-hugging lower portion, a building's upper stories could where suitable be "set back" from the street, along part or all of the frontage. Depending on the particular location, even a "major" upper-level setback might well be quite acceptable or, indeed, desirable. Upper-level setbacks could help to maintain the prominence of old corner buildings, generally mitigate the bulkiness of new structures, and even avoid potential increases in wind speed.

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Cont.

While we're on this general subject, I'll mention a curious minor inconsistency that I've noticed regarding the draft's Alternative 3. For that alternative, the building massing implied by shadow-pattern graphics such as Figure 53 appears to be somewhat different from that shown in visual simulations such as Figure 83.

Detailing and Ornament

The draft doesn't call clearly and strongly enough for the use of suitable detailing and ornament. Considering the project's nature and setting, such use is essential to making the City Administration Building what it can and should be: a model of contextual design.

Elsewhere, design of new structures within historic areas has too often followed the conventional approach which relies on providing similarity in terms of things such as massing, height, and materials—and downplays or ignores the whole crucial factor of detailing and ornament. Around the world there are countless examples of new buildings which have the same massing, height, and materials as the adjacent old structures but which nonetheless offend the area because of their either brutal or insipid plainness. Conversely, there are examples of new buildings which break some of the conventional rules about massing, etc. but which nevertheless fit in successfully because they include enjoyable articulated details that resonate with those on the neighboring old structures.

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The conventional approach has reflected ideological hang-ups, such as about even the word "ornament," that have needlessly crippled so many attempts to relate to historic surroundings. But this is 1994, not 1960. Suitable ornament really isn't a crime. And citizens now demand that if a big new structure is to be built within a historic area, visual compatibility will be ensured through whatever means are necessary.

Oakland's historic Downtown District is, of course, characterized by articulated detailing and ornament. And as Appendix E correctly mentions, "ornamentation" typically has served here to reduce perceived building mass. Now the project under consideration would demolish ornamented old structures, and would replace them with one or more new buildings of much greater size. All of this strongly suggests the use of detailing and ornament as a mitigation measure.

The draft does discuss such use to some extent, but only through language that

is either extremely generalized or merely illustrative. For instance, on page 20, the referenced article of Mitigation Measure M127-3c says just that "Prior to final design approval, the project sponsor shall include design features in the project to maximize the compatibility of new buildings with the Downtown District." And that page's opening discussion says that specific measures "could" include "recreating elements of the demolished structure(s) "such as" facade detailing.

Now let's look closely at Appendix E's most relevant passage, consisting of this helpful observation and guideline:

Observation: Existing district buildings were constructed during an earlier age and represent a type of construction characterized by highly crafted street facades and articulated detailing.

Guideline: New district buildings should respond to this craftsman-ship. Regardless of the materials used, they should showcase the best of current building craft and be constructed with the highest level of craftsmanship available.

I find these observations, even sleight of hand, and an evident reluctance to face the real issue. The "observation" is about characteristic actual form or product but the "guideline" seems to focus on process or precision—and to ask only for good "craftsmanship."

For a ready example of the difference, consider the lofty and very flat outer walls on the West Wing of the National Gallery of Art in Washington, D.C. Their elegantly smooth masonry surfaces display exquisite workmanship. If you look closely you can see the precisely executed thin masonry joints, which could be called "detailing." But of course the result has nothing at all in common with the highly articulated facades of Oakland's Downtown District.

To fit properly into this district, the City Administration Building should include sufficient elements having substantial intricacy or "richness." Its facades should stimulate the eye and invite lengthy perusal rather than instant dismissal. This could be achieved by providing a highly abstracted cornice and a variety of perforatory string courses. There need to be some visually richer things, such as modillions to enhance the cornice, elaborated trim to suggest a pediment entrance, or finesses or cartouches to relieve and enliven a large wall. And there should be suitable articulation at a wide range of heights so that the building will be enjoyable whether it's glimpsed as a distant skyline feature, viewed from a street corner a block away, or examined close at hand right in front of it.

The natural way to approach this matter might start by conceiving a sort of "style" or "manner" of "articulation" the degree and grain of articulation on the historic West Wing of the National Palace, Plaza MacLafferty, Oakland Bank of Commerce, Alameda Gardens, and Broadway Buildings. Then—as a working guide to construction—try to achieve a rough equivalent of this on the new Administration Building.

Another observation will be especially important on the new building's facades and how they will relate to the plaza. Here, it should be deliberately used to conserve and enhance the richness of the historic City Center KCR Building, strengthen the relationship to the historic and spirit that now distinguishes the plaza's character and architectural expression. In contrast to the glassier and smoother modern buildings facing the plaza, doing this will help to define the environment and create a strong sense of place. It will also serve to strengthen the visual continuity of the Downtown District's visual continuity.

12
Cont.

Appendix E contains the interesting recommendation that "The overall design of the Plaza should be symbolic and make allusions to either Oakland's history or refer to its geographic and economic role in the Bay Area." Something like that could be said about the City Administration Building and its detailing. For example, Oakland's history or people might well be referred to by means of figurative bas-relief or other architectural sculpture.

12
Cont.

Miscellaneous Comments

Finally, here are some mostly technical comments on various matters:

1. On pages S-11 and 24, the references to Sec. "15125(d)(2)" of the CEQA Guidelines evidently should be to "15126(d)(2)" instead. 13A
2. The mitigation measure which pages S-15 and 283 label as "HIST-1a" is referred to by pages S-16 and 303 as "HIST-1." The latter seems more consistent with the draft's general numbering scheme. 13B
3. Pages S-16 and 303 describe Mitigation Measure VIS-1 by referring to actions under another issue-area heading. But in doing so, page S-16 cites "HIST-1, HIST-2, HIST-3, and HIST-4" whereas page 303 cites "HIST-1, HIST-2, HIST-4, and HIST-5." 13C
4. Similarly, in describing Mitigation Measure VIS-2 page S-16 refers to "HIST-6a, 6b, and 6c" while page 305 refers to "HIST-5a, HIST-5b, and HIST-5c." 13D
5. Page S-27's cross-reference to Mitigation Measures "HIST-6a, HIST-6b, and HIST-6c" presumably should be to "HIST-5a, HIST-5b, and HIST-5c" instead. 13E
6. On pages S-17 through S-39, the caption "TABLE S" should be changed to "TABLE S-3." 13F
7. Pages 33-34 list "discretionary approvals required from the City," but fail to mention that the S-8 Zone requires—with a limited exception for building entrances—a major conditional use permit for Administrative Civic Activities located on the ground floor within 20 feet of a street line. (Check Sections 6453-6454 and 9201(a) of the Zoning Regulations.) This provision could come into play regarding City offices along, for instance, 16th Street under Alternative 4 or the S-8 portion of 15th Street under Alternatives 1 and 2. 13G
8. Pages 83 and 117 implicitly conflict with each other about the Woodward Building's height in stories. 13H
9. Figure 7 shows the Tucker Building (at 16th and Jefferson) as "Retail/-Commercial" while page 122 says it's in "office" use. 13I
10. Page 85 describes the Pardee Building's height differently than page 120. 13J
11. I question page 85's statement that the old building on the City Hall West site had served as City office space "for about 30 years." That seems like an overstatement. 13K
12. Figure 8 doesn't show any "land use designation" for the Plaza Building. 13L
13. Figures 10 and 11 mistakenly include the Plaza Building within the project site for Alternatives 1 and 2. 13M
14. Although page 117 says that the Rotunda Building's "original" portion is "four-story-plus-mezzanine," doesn't it also have a mostly windowless attic story? Although the same page says that the 1924 addition 13N

is "six stories," is it really five stories or (considering its interior) five stories plus a mezzanine?	13N Cont.
15. Page 117 should say that the Rotunda Building's addition is at 16th Street's intersection with Telegraph Avenue, not "Broadway."	13O
16. Near the top of page 129, the address " <u>1239</u> Broadway" is obviously incorrect.	13P
17. Several statements about local freeways are either inaccurate or confusing. One of them is page 147's remark that "I-980 and I-580 have a full interchange about 1/4 mile east of the 18th Street ramp." Another is page 149's statement that "I-980 transitions into SR-24 about 1/4 mile east of the 18th Street ramp." Still another is page 149's claim that "...I-580...connects with I-80 approximately 1/4-mile to the north of the project site."	13Q
18. Page 154's statement that the Bay Area Air Quality Management District's TDM program "will" go into effect on July 1, 1994 should be updated.	13R
19. The wording near the top of page 156 can be read as implying that the City doesn't yet have a trip reduction plan, but page 205 says that the City currently has in place a "trip reduction program...." Is that inconsistent or merely confusing?	13S
20. There's a slight discrepancy between page 160 and Table 15 regarding the p.m. peak-hour load factors on BART's "Daly City to Richmond" route.	13T
21. Figure 24 obviously omits some nearby bus stops (such as the one adjoining the Rotunda Building's east wall), even though text on pages 160 and 162 seems to imply that the map shows all stops within 1/4 mile of the project area.	13U
22. Table 16's claim that the peak-hour headway for AC Transit's route "40, 40L" is <u>20</u> minutes looks incorrect.	13V
23. Are there unintended inconsistencies about what construction codes would apply, especially for existing structures like the Broadway Building? Pages 174 and S-18 of the Draft EIR/EIS refer, right in Mitigation Measure GEO-4, to "current earthquake building standards according to the City's Comprehensive Plan and the current or adopted Uniform Building Code." Pages 335 and S-35 refer, in Mitigation Measure SERV-2.1, to "the 1991 Uniform Building Code and the 1991 Uniform Fire Code." For comparison, Policies 3.10 and 3.11 of the City's Historic Preservation Element refer to "the Oakland Building Code; the Uniform Code for Building Conservation where permitted under state law; and, for qualified historical buildings, the State Historical Building Code." The Draft EIR/EIS's Chapter V quotes Policy 3.10 but doesn't mention Policy 3.11, which actually seems to have a broader field of concern including seismic retrofit programs. Is revision or clarification needed about all this?	13W
24. Along the left side of Figure 33, the captions "Alternative 3" and "Alternative 4" should be changed to, respectively, "Alternative 5" and "Alternative 6."	13X
25. Some of the figures in Table 23 (regarding displacement) conflict with statements on page 277.	13Y
26. So-called Impact LAND-3 (see pages 279 and S-34), which states that the project would comply with present zoning, doesn't read like an	13Z

- "impact" as such. However, the text there neglects to mention that discretionary zoning approvals would need to be secured. Thus the project as a whole isn't permitted "by right" (so to speak) under existing zoning.
27. On page 305's thirteenth line, "northeastern" should be changed to "northwestern." 13Z
Cont.
28. Page 305's last sentence mistakenly indicates that Figures 71 and 72 show "ground-level" views. 13AA
29. Why do pages 351 and 352 seem to indicate that there are four "build" alternatives rather than six? 13BB
30. On page 370 the label "HIST-6" should be changed to "HIST-5." 13CC
31. In page 372's paragraph on cumulative impacts, the second and third sentences appear incomplete even at their own level of generalization. For example, impacts regarding "visual quality and urban design" aren't mentioned (even though some of this would be both cumulative and significant). Furthermore, I suspect that whoever wrote the third sentence somehow got the concept of "significant cumulative impacts" confused, there, with that of "unavoidable" ones. 13DD
32. I question whether Appendix E's section on "General Guidelines for New Buildings" quotes the relevant version of the Secretary of the Interior's rehab standards 3 and 9. Their wording in the appendix seems to match language in the Code of Federal Regulations (see Title 36, Part 67) which apparently is still to be used when property owners seek certification for tax benefits. But is that purpose really involved here? I gather that for other purposes people are now supposed to use the somewhat different version which emerged from a recent revision—and which seems to be shown in Table 4-3 of the City's Historic Preservation Element. 13EE
13FF

Sincerely,

JOHN S. ENGLISH

Attachment: copy of
pages 8-10 of design
resources report

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MIDDLE BROADWAY

This most intense core of the Central District includes a mixture of structures of varying architecture and scale. The variety is consistent with the continuing historic importance of the area. Rather than seeking homogeneity, the area should express this historic continuity by preserving and utilizing the best structural examples of different growth periods. Although there are many buildings and places with major significance or noteworthy names, two public spaces have been singled out for special attention. These are City Hall Plaza, and the 15th Street pathway between San Pablo Avenue and Telegraph Avenue. Other important places, such as the intersections of Telegraph Avenue and Broadway, 14th Street and Broadway, and 15th Street and Broadway, are not treated.

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City Hall Plaza is potentially one of the most outstanding urban spaces in the nation. It is architecturally defined by the walls of surrounding buildings representing different periods and styles. A triangular shape, street approaches, and City Hall tower provide unusual interest and focus. Presently, wide streets, parking areas, light poles, and chain fences on its periphery, confuse its relationship to surrounding buildings and severely reduce its visual and functional utility as a major park area of the Central Business District.

The sketch suggests a number of ideas to strengthen the Plaza's inherently excellent design, including the following:

(a) Emphasis of the enclosure of the Plaza through surrounding buildings;



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(b) Elimination of the existing pattern of street light poles and other vertical elements which now creates visual barriers within the defined space;

(c) Narrowing of Washington Street, and use of a prominent pavement design to integrate City Hall with the Plaza;

(d) Establishment of a strong visual and pedestrian connection between 15th Street, the Plaza, City Hall, and Washington Street; and

(e) Design of the planted areas to accommodate pedestrian movement and seating areas without endangering the landscaping.



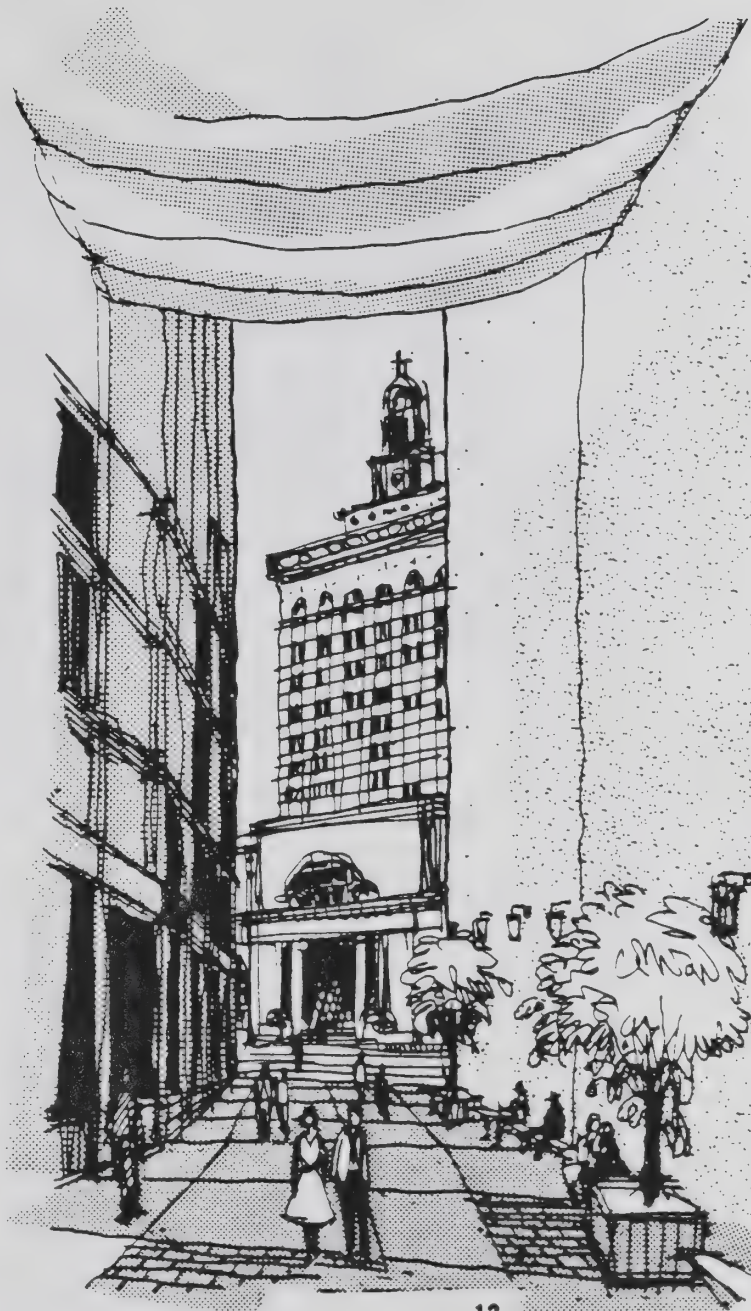
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10

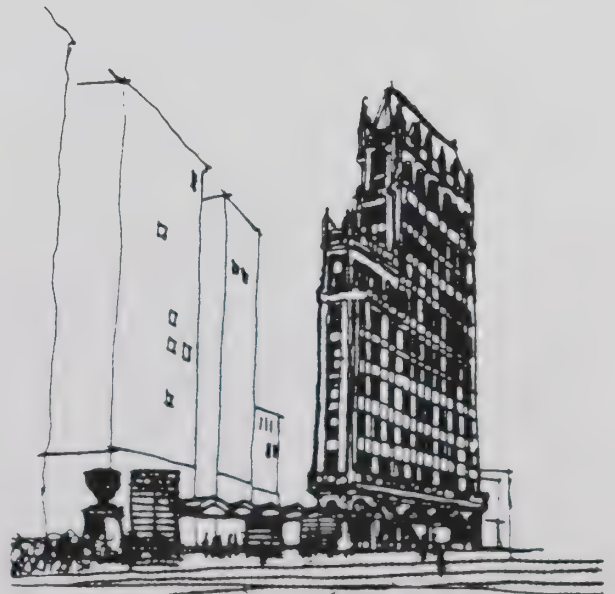
The juxtaposition of these strikingly different Victorian facades along San Pablo Avenue makes an important contribution to the heterogeneity of the Middle Broadway Area.

Fifteenth Street, between Broadway-Telegraph and San Pablo Avenue, becomes an exciting pedestrian connection between City Hall Plaza and the center of the commercial core. The narrow aisle-like quality of the path, and the contrast linking the Plaza's greenery at one end and the intense commercial activity at the other, offer a unique visual experience. The sketch incorporates the following design concepts:

- (a) Directing strong attention to entry points, possibly through use of an ornamental gate and an interesting pavement design extending beyond the entry points; and
- (b) Recognition and accenting of the depth and narrowness of the pathway through use of small light fixtures and planting in scale with the confined space.



The Pierce Building, a fine example of the early "Gothic Skyscraper" period, expresses the important Telegraph-Broadway confluence and is an Oakland landmark. Recent remodeling has already destroyed the graceful arched facade at street level.



Letter J (John English)

- 1) As stated in the response to Comment B-1, p. 54 of this Final EIR Addendum, the Draft EIR/EIS analyzes a range of reasonable alternatives, as required by CEQA *Guidelines* Sec. 15126(d), that generally would meet the overall purpose and need of the project, the provision of City office space to replace space lost as a result of the 1989 Loma Prieta earthquake. Among the alternatives included is an "Existing Buildings on Taldan and Dalziel Blocks Alternative," revised in this Final EIR Addendum, that would preserve all existing buildings on those two blocks and would include new construction on the Dalziel block, as is proposed by the commenter. Also as noted in the response to Comment B-1, the Draft EIR/EIS provides sufficient information on the range of alternatives analyzed to allow the decision-makers to choose among those alternatives or variants of those alternatives, including the alternative suggested by the commenter and other variants that might involve a different combination of buildings in the project area but would result in impacts within the range identified in the Draft EIR/EIS and described in Chapters IV and VI of the Draft EIR/EIS. The specific alternative recommended by the commenter would result in demolition of fewer buildings that are contributory to the Downtown Historic District, compared to the preferred project, and would retain more of the district's pattern of alternating high- and low-rise structures, as noted by the commenter. This would reduce impacts on architectural resources, although not to a less-than-significant level, as this alternative would involve demolition or partial demolition of contributory structures on both the Taldan and Dalziel Blocks. The commenter's alternative would result in some of the operational difficulties described in the discussion of the revised "Existing Buildings on Taldan and Dalziel Blocks Alternative" in this Final EIR Addendum, including inadequate floor-to-floor heights in the Dalziel Building, and small floor plates and restrictions on the flexibility of office space in the Dalziel block buildings due to the retention of some existing building walls.
- 2) If one of the alternatives including the Taldan Block (Alternatives 1, 1A, 4, 5, or 6) is approved, the project would include widening of Kahn's Alley (the 15th Street right-of-way between Broadway/Telegraph Avenue and San Pablo Avenue) to provide a more visible connection between Broadway and City Hall Plaza, as is noted in the description of each of those alternatives (see, for example, p. 13 of the Draft EIR/EIS). To clarify the visual setting and impacts associated with Kahn's Alley, revisions are made to pp. 139 and 331 of the Draft EIR/EIS. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for these clarifications.

Regarding the alternatives under which Kahn's Alley would be widened, the City proposes the widening only with alternatives that would involve construction on the Taldan Block (Alternatives 1, 1A, 4, 5, and 6). The current plan calls for widening Kahn's Alley from 16 feet to 40 feet. Retail storefronts likely would be provided, and an entrance to the City Administration Building might also be included. As noted in the discussion of Alternative 1A, in Chapter II.A of this Final EIR Addendum, Kahn's Alley could be used for deliveries during limited hours. The Draft EIR/EIS includes mitigation measures to reduce the project's impacts on the visual quality and urban design of the project area vicinity, including design of the new building(s). In addition, the mitigation measures would require that the Kahn's Alley frontage of any structure built adjacent to the alley, be designed in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Measure HIST-5a) and include design features to maximize the compatibility of new buildings (including potential construction along Kahn's Alley) with the Downtown District (Measure HIST-5c). However, design details would have to be left to the selected design-build team, operating within the guidelines adopted by the City (see Mitigation Measure HIST-5b).

The Draft EIR/EIS concludes that construction of the new City Administration Building would have a significant, unavoidable effect on Visual Quality and Urban Design (Impact VIS-2, p. 303). The commenter correctly notes that, were Kahn's Alley to be widened substantially, the visual quality of a pedestrian trip through the alley could be altered. In regard to the visual simulations noted by the commenter, no attempt was made to depict a widened Kahn's Alley; such an exercise would have been speculative. As the commenter notes, the simulations are intended to depict generalized building massing only.

In regard to development of the City Administration Building on the Taldan Block without widening Kahn's Alley, such an option could be approved by the City Council without additional environmental review. It would similarly be permitted to include retail activity along Kahn's Alley, including food service establishment(s); a sidewalk cafe would require a major conditional use permit.

As noted on p. 11 of the Draft EIR/EIS, with the project, Kahn's Alley would "serve as an extension of the plaza to Broadway. The redesigned plaza would include seating areas and open area(s) for public gatherings." No design plan is available for Kahn's Alley, as no final design for the City Administration Building project would be available until after completion of the environmental review process.

IV. Written Comments and Responses

Given the significance criteria identified on pp. 301-302 of the Draft EIR/EIS, widening of Kahn's Alley would not, in itself, constitute a significant effect on visual quality and urban design. Therefore, no mitigation is required. Some or all of the commenter's suggested measures could be incorporated into the project design as part of the project approval process. Other factors, such as visibility and pedestrian safety, could be relevant to the ultimate design of Kahn's Alley. The City Council would consider the comments as part of the project approval process.

- 3) As noted in Chapter IV., Project Description (p. 13 and p. 17 of the Draft EIR/EIS), under the City Administration Building project, the Plaza Building would be retained as a separate structure, and would not be part of the City Administration Building. As stated in the response to Comment A-2, p. 49 of this document, the City is planning to rehabilitate the Plaza Building, including performing a seismic retrofit. That separate project would be subject to its separate environmental review, including review of impacts on the building's architectural character. For information, the Plaza Building is not currently red-tagged and continues to have retail tenants; office tenants moved out of the building in 1994. The Oakland Redevelopment Agency is the owner of the Plaza Building.
- 4) The impact and associated mitigation measure labeled "HIST-4" at the top of p. S-28, which do not appear in the text of Chapter VI, should be deleted; they were included on p. S-28 due to an editing error. Please see Chapter II.B, Addenda to the Draft EIR/EIS.
- 5) Potential truck-pedestrian conflicts described in Impact TRUCK-1 on p. 368 of the Draft EIR/EIS would occur in or near the expanded City Hall Plaza. While the Plaza would be expanded with all "build" alternatives, no such truck-pedestrian conflicts would be anticipated with Alternative 2, which would have its loading dock on Clay or 16th Street, away from the Plaza, or with Alternative 3, which would have its loading dock on 16th, 15th, or 14th Streets, west of Clay Street. If Alternative 2 or 3 were selected, development would not occur on the Taldan Block or at the Rotunda Building. Future development that might occur on the Taldan Block or Rotunda Building could be subject to additional environmental review, including a potential analysis of loading activity.

Regarding the proposed underground loading dock, the Draft EIR/EIS analysis includes both underground and surface loading for alternatives including the Taldan Block (Alternatives 1, 1A, 4, 5, and 6) to ensure that a range of options is analyzed. While the underground loading dock was the preferred plan at the time the Draft EIR/EIS was

prepared, that plan is no longer considered likely because the cost would be prohibitive and because of potential adverse effects on the design of City Hall Plaza. Please see the revised design recommendations for the Plaza, included in the Appendix to this Final EIR Addendum, which no longer include the underground loading dock. The analysis of loading activity on p. 368 of the Draft EIR/EIS has been revised to include the new possibility that loading activity for the Taldan Block could occur via Kahn's Alley and San Pablo Avenue, to add 16th Street as a potential loading location for the Dalziel block, and to delete reference to semi-trailer trucks using 15th Street for Taldan Block deliveries (please see Chapter II.B, Addenda to the Draft EIR/EIS). The statement regarding passenger drop-off on 14th Street would apply for all "build" alternatives if San Pablo Avenue were closed to vehicles at, rather than south of, 16th Street. However, additional passenger drop-offs would not be precluded.

- 6) Mitigation Measure PED-1 on p. 368 expressly calls for increasing bicycle use by making it more attractive and feasible. Effective implementation of this measure would involve provision of more bicycle racks than the five spaces that would be demanded based on the calculations shown. Additional bicycle racks could be used for "pool" bicycles; however the City is not currently planning implementation of such a program. As noted on p. 163, existing bicycle racks in the City Center area may not be ideally located to encourage bicycle use. However, the Draft EIR/EIS focuses on bicycle-related effects of the City Administration Building project, not on existing shortcomings in bicycle parking or usage. Because impacts on pedestrian and bicycle activity were not identified as significant, the Draft EIR/EIS does not identify mitigation measures that would be required to reduce the impact to a less-than-significant level. However, Mitigation Measure PED-1 offers suggestions for increasing bicycle use. This measure could be required by the City Council as part of project approval. The City could consult with the East Bay Bicycle Coalition regarding placement of bicycle racks.
- 7) The Draft EIR/EIS determined that effects of the proposed City Hall Plaza rehabilitation would not be significant (see Impact VIS-3, p. 330). Comments on the Recommendations of the Ad Hoc Staff Committee for the City Hall Plaza Redesign are not directed at the adequacy of the Draft EIR/EIS, and require no response. Those comments will be directed to City staff and the City Council for consideration in project approval.
- 8) The commenter's remarks favorably comparing Alternative 6 to Alternative 1 do not address the adequacy of the Draft EIR/EIS and require no response. It should be noted,

regarding physical connection of City Hall to a structure on the Clay Street Garage site, the rehabilitation of City Hall includes installation of base isolators, which will allow City Hall to move laterally in the event of an earthquake. Connecting City Hall to another building would require a complex system that would allow the two structures to move independently. Regarding parking for Alternative 6, the subsurface garage would include a subsurface connection of the Dalziel block and Clay Street Garage site beneath 15th Street; the subsurface parking beneath the garage site would be limited to a single level in order to possibly re-use the existing Clay Street Garage foundation for the new structure. As noted in the response to Comment J-2, above, the visual simulations in the Draft EIR/EIS are intended to depict generalized building massing only, and are not intended to show design details such as an aerial pedestrian bridge.

Regarding the range of alternatives analyzed, please see the response to Comment J-1, above. It should be noted that no other uses for the Clay Street Garage site are under analysis or are contemplated.

- 9) Regarding the percentage of City employees traveling to work by mode, the discussion on p. 354 of the Draft EIR/EIS is intended to illustrate that the 35 percent reduction in Institute of Transportation Engineers (ITE) trip generation rates (which are rates for vehicle trips, but are generally understood to translate closely to person trips because of typically low transit usage associated with sites surveyed for ITE) is conservative because not all City employees travel to work in single-occupancy vehicles. The apparent discrepancy between the percentage on p. 354 and that in Table 29 on p. 358 is accounted for by the fact that workers traveling in carpools do not eliminate vehicle trips (*i.e.*, each two-person carpool generates one vehicle trip in each direction), as is noted by the commenter. For purposes of calculating vehicle trips, which is the focus of the text on p. 354, a percentage of carpool and vanpool vehicles must be added to single-occupancy vehicles. The 40 percent figure used on p. 354 includes the 45.5 percent of workers not traveling in single-occupancy vehicles less one-half of those traveling by carpool and vanpool (about 5 percent), assuming two persons per carpool. For clarification, the text on p. 354 is revised to refer to employees not generating vehicle trips. Please see Chapter II.B, Addenda to the Draft EIR/EIS.

The trip generation rates in Table 28, p. 355, include all trips by employees, as well as visitor trips; in the peak hours analyzed, most trips are to and from work. Outbound percent is the percentage of vehicle trips made away from the project area; the percentage

of outbound retail trips in the a.m. peak hour is correct as stated. (As noted in the table, the trip generation rate was derived from the *Kaiser Center EIR*, and represents comparable retail development. The percentage of trips in the afternoon peak hour and the inbound-outbound split of those trips was also taken from the *Kaiser Center EIR*, while comparable information for the morning peak hour was from the San Diego Association of Governments publication "Traffic Generators," March 1993, a standard trip generation reference, as the *Kaiser Center EIR* did not analyze morning traffic.) It should be noted that the absolute number of a.m. peak-hour retail trips is quite small – no more than 30 vehicle trips with any of the "build" alternatives analyzed in Chapter VI. Note "b" in Table 28 refers to the vehicle trip generation rate for Alternatives 4 and 5, as stated in the text on p. 354 of the Draft EIR/EIS. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for a correction to this note.

Displacement of existing activities would result in a small decrease in existing trips made to and from the project area. For a conservative analysis, these trips were not deducted from project trip generation. As for future occupation by new uses of space currently occupied by the City, traffic effects of that development are accounted for by the inclusion of an annual growth rate in traffic volumes of 0.3 percent, based on Association of Bay Area Governments projections, as stated on pp. 351-352 of the Draft EIR/EIS.

Regarding distribution of project trips, it should be noted that the project would have only an incremental effect on traffic in the project area vicinity, and therefore relatively minor adjustments to trip distribution patterns would not affect the overall conclusions of the analysis, namely that project traffic impacts would not be significant. The following clarifications are offered for the reader's information.

Interstate 980 is considered to run east-west in the project area vicinity (Caltrans, 1993); the actual orientation is more northeast-southwest. Regarding the indication of distribution of project trips shown in Figure 89, Figure 89 shows only outbound trips in the p.m. peak hour; the title of the figure should read (new text underlined) "Project Trip Distribution - P.M. Peak Hour Outbound." One heavy indication line was inadvertently left off the map, showing traffic heading to southbound Interstate 880 via the westbound Interstate 980 on-ramp at 11th and Brush Streets. In the fourth sentence on p. 356, the reference to a "14th Street on-ramp of I-980" should read "11th Street on-ramp." Also, for Alternatives 4 and 5, which would not include on-site parking and would thus result in most new parking demand being accommodated south of 14th Street, Figure 89 should show an indication

line for cars entering eastbound I-980 at the 12th and Castro on-ramp. The third sentence on p. 356 of the Draft EIR/EIS, the reference to 12th Street should be for Alternatives 4 and 5 only. In addition, the "1%" indicated on Clay Street was a graphics error and should be deleted; with that change, the percentages add up to 100 percent. The above changes affect only Figure 89, and not the analysis in the text of Chapter VI of the Draft EIR/EIS. With those changes, Figure 89 reflects the trip distribution used in the Draft EIR/EIS analysis. As indicated on Tables 30 through 33, pp. 359-362 of the Draft EIR/EIS, intersections in the project area vicinity operate well within the range of acceptable levels of service.

Regarding the "19th Street" on-ramp to eastbound I-980, although this ramp leaves Castro Street just beyond 18th Street, it enters I-980 at 19th Street, and is referred to as the 19th Street on-ramp (Caltrans, 1993). The "project site" indicated in Figure 89 is corrected in the revised Figure 89. (Please see Chapter II.B, Addenda to the Draft EIR/EIS.)

Regarding distribution of retail trips, note that, except for Alternative 3, which would not include retail, retail trips would make up between about 9 percent (Alternative 2) and 26 percent (Alternative 4) of the total p.m. peak-hour trips (and a smaller percentage in the a.m. peak hour), depending on the "build" alternative analyzed, and thus would have relatively less effect than employee trips on the intersection analysis. Employee trip distribution was applied to retail trips because of the project area's close proximity to key freeway routes, which narrow the range of roadway choices for many drivers by presenting an obvious route to and from the project area vicinity. Midday trip distribution is not relevant because the traffic analysis considered the morning and afternoon peak hours.

Regarding transit trips, distribution was made in the same geographical directions as for vehicle trips, although not necessarily using the same streets.

- 10) The Draft EIR/EIS parking analysis did not include the loss of about 50 spaces from elimination of the lot on the west side of the Dalziel block (Alternatives 1, 2, and 6) and the loss of about 100 spaces from the elimination of the lot on the Miller Building block (Alternative 3). Accordingly, the parking analysis has been corrected. However, the revisions result in no change in the conclusion regarding impact significance. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for the revised parking analysis.

The EIR, including this Final EIR Addendum, analyzes changes *from existing conditions* that would occur in the project area vicinity as a result of the proposed City Administration Building. As is stated on p. 10 of the Draft EIR/EIS, the net change in City employment in the project area vicinity as a result of the project (for all "build" alternatives except Alternative 5) would be about 335 people. This number has subsequently been reduced to about 220 people with the City's reduced program, as stated in the analysis of Alternative 1A (see Chapter II.A of this Final EIR Addendum). Transportation effects are analyzed based on the 335-person increase in City employees in the project area, along with the net new retail space that would be added (see Table 1, p. 6 of the Draft EIR/EIS), background and cumulative growth (see pp. 351-352 of the Draft EIR/EIS), and parking that would be provided in varying amounts with each "build" alternative. For alternatives that would include parking, the parking spaces currently used by City vehicles that would park in the new City Administration Building would become available for use by others (see p. 364 of the Draft EIR/EIS). The same would be true for City employees who currently park in other lots and garages and would park in the new City Administration Building. No net new spaces would be made available for City pool vehicles or City employees under any of the "build" alternatives, including Alternative 1A, although the location of some spaces would shift to the new City Administration Building.

The net change in the project area vicinity would be the number of parking spaces added by each "build" alternative minus the parking lost as a result of project development (see Table 34 in Chapter II.B, Addenda to the Draft EIR/EIS). However, regardless of the number of on-site spaces provided, the project would result in no change in the number of spaces allocated for City employees or City pool vehicles in the project area vicinity. The only change in these spaces would be a shift in their location to the project area under those alternatives that would include on-site parking. For Alternative 6, which would provide substantially less on-site parking than other "build" alternatives that would include parking, fewer City employee and pool vehicle parking spaces would be moved from surrounding lots and garages to the project site. For Alternatives 4 and 5, all City employee and pool vehicle parking would remain off-site, as at present. As stated on pp. 364 and 366 of the Draft EIR/EIS, some drivers could be forced to park farther from their destinations, particularly with Alternative 6. Visitor parking demand would not be expected to increase substantially, as City departments with high public interaction are largely in the project area vicinity at present; at any rate, most visitor parking is short-term, resulting in high turnover and lower demand than with employee parking. The revised parking analysis in

Chapter II.B of this Final EIR Addendum includes an additional increment for City Administration Building visitor parking.

As with project traffic effects, conclusions regarding the project's less-than-significant effects on parking in the project area vicinity would not be affected by the above revisions. No change is required to Impact PARK-1. This impacts statement summarizes the proposed project's effects on parking. The statement is an impact statement; however, the impact is not adverse.

The Transportation Demand Management (TDM) Program cited in Mitigation Measure PARK-1 on p. 365 of the Draft EIR/EIS might typically include components such as providing preferential and/or discount carpool and vanpool parking; assisting employees in establishing ridesharing; provision of transit passes and/or employee reimbursement for use of public transit (potentially by charging other employees for parking and/or eliminating free employee parking); making City pool vehicles and/or transit passes available for employee travel on City business; provision of convenient bicycle parking and employee showers to encourage bicycle commuting (included in the Draft EIR/EIS as Mitigation Measure PED-1); and implementation of telecommuting and/or flexible work weeks (*e.g.*, four-day schedule) for certain employees. The City also could establish a transit information center that could provide transit and ridesharing information and sell transit tickets. As noted on p. 205 of the Draft EIR/EIS, the City has a trip reduction program in place. In the downtown area, which is well-served by transit, this program focuses on marketing of transportation alternatives and educational programs to encourage transit use by City employees. The current program also includes participation in special events to publicize alternatives to driving alone, such as California Rideshare Week, Bike-to-Work Day, and the BAAQMD's Spare the Air program. The City directs potential carpoolers to the RIDES organization, which matches drivers with similar destinations. In addition, the City recently received a state grant to construct additional bicycle parking (Hughes, 1994).

Regarding the inconsistency between pp. 364 and 365 of the Draft EIR/EIS, and regarding the zoning discussion on p. 364, please see the revised parking analysis in Chapter II.B of this Final EIR Addendum. Regarding the summary descriptions of parking impacts in Chapter IV, please see the revised text for pp. 18, 21, 23, 27, and 29 in Chapter II.B of this Final EIR Addendum.

Figure 23 has been corrected to include block faces and loading zones that were not included in the Draft EIR/EIS. The total on-street capacity in the area studied is approximately 510 spaces. Please see Chapter II.B, Addenda to the Draft EIR/EIS. In response to the question about 15th Street between Broadway and Franklin, Figure 23 in the Draft EIR/EIS correctly states that there are five metered spaces. (Two loading spaces take up a portion of the block.) Regarding 15th Street east of Franklin, parking there is metered (one hour limit). In addition, Figure 24 has been corrected to include additional bus stops not shown in the Draft EIR/EIS.

- 11) Impact HIST-5 provides a discussion of the impacts of demolishing contributory buildings and construction of new non-contributory buildings in the Downtown District. Mitigation identified in the Draft EIR/EIS includes design of the new building(s) in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties; design of the new building(s) in accordance with design guidelines adopted by the City; and inclusion of design features to maximize the compatibility of new buildings with the Downtown District. The text accompanying the third mitigation measure does include, *as a possibility*, "de-emphasizing the mass and bulk of the new structure(s) by visually breaking up the building facades through the use of minor setbacks and other three-dimensional features and the variation of facade colors, textures and/or materials." This discussion is compatible with the Design Guidelines in Appendix E, which allow for the streetfront facade to be articulated and modulated, and call for new buildings to respond to the smaller scale of existing commercial buildings, while at the same time maintaining the overall streetfront facade in the same plane as adjacent buildings. Design of the project in accordance with the design standards (Mitigation Measure HIST-5b) would reduce the project's impact on the Downtown District; nevertheless, this would remain a significant, unavoidable effect. As stated in the response to Comment A-2, p. 49 of this document, the preferred project as currently proposed would include a setback on the San Pablo Avenue frontage of the Dalziel block at approximately the height of the existing Pardee Building to recall the Pardee Building facade.

With regard to impacts on the Plaza Building of adjacent new construction (Impact HIST-3), the project would comply with the City's Design Guidelines, as described above. As noted by the commenter, setbacks from the Plaza Building could be used, possibly at upper levels, to maintain the prominence of the Plaza Building.

For Alternative 3, the commenter is correct in noting that, as is stated in Footnote 1 on p. 221 of the Draft EIR/EIS, the massing figure used in the analysis of shadow impacts (Figures 29, 32, 35, 38, 41, 44, 47, 50, and 53) does not use the "notches" shown in the visual simulations (Figures 83 and 85). The massing figure for Alternative 3, prepared as part of the planning process for the City Administration Building project, contains more articulation than for other alternatives. Although this articulation was included in the visual simulations, it was not included in the shadow analysis to provide a more conservative analysis of shadow impacts. As noted on p. 221 and p. 303 of the Draft EIR/EIS, as well as on each figure illustrating shadow impacts and each visual simulation, the shadow and visual simulation analyses are intended to depict generalized building massing only.

- 12) The Draft EIR/EIS includes Mitigation Measure HIST-5b, which would require design of the new building(s) in accordance with design standards adopted by the City. These standards require, among other things, the use of exterior materials that are generally neutral in color and complementary to existing buildings in the Downtown District, and reinforcing the character of this Downtown District but not duplicating the exact form, style or detailing of historic structures. The Draft EIR/EIS concludes that, even with mitigation in the form of appropriate design of the new building(s), construction of the project would result in a significant, unavoidable effect on architectural resources and visual quality and urban design. The commenter's specific recommendations for building design are not contradictory to the intent of the design guidelines presented in Appendix E. These recommendations will be considered by the City Council as part of the project approval process, and could be considered by the jury that would judge the project design-build team designs.
- 13) None of the corrections noted by the commenter in this comment has any bearing on the significance of effects identified in the Draft EIR/EIS. The following clarifications and corrections are provided for the reader's information.
- 13a) The commenter is correct. Please see Chapter II.B, Addenda to the Draft EIR/EIR, for changes to pp. S-11 and 24 of the Draft EIR/EIS.
- 13b) The commenter is correct. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for changes to pp. S-15 and 283 of the Draft EIR/EIS.

- 13c) The reference under Mitigation Measure VIS-1 is correct on p. 303 of the Draft EIR/EIS. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for changes to p. S-16 of the Draft EIR/EIS.
- 13d) The reference under Mitigation Measure VIS-2 is correct on p. 305 of the Draft EIR/EIS. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for changes to p. S-16 of the Draft EIR/EIS.
- 13e) The commenter is correct. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for changes to p. S-27 of the Draft EIR/EIS.
- 13f) The commenter is correct. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for changes to p. S-39 of the Draft EIR/EIS.
- 13g) The commenter is correct. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for changes to p. 33 of the Draft EIR/EIS.
- 13h) The commenter is correct. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for changes to p. 117 of the Draft EIR/EIS.
- 13i) The use of the Tucker Building (at the time of Draft EIRE/EIS publication) is correct as depicted in Figure 7 of the Draft EIR/EIS. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for changes to p. 122 of the Draft EIR/EIS. (Since publication of the Draft EIR/EIS, the building has become vacant.)
- 13j) The height of the Pardee Building is correct on p. 120 of the Draft EIR/EIS. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for changes to p. 85 of the Draft EIR/EIS.
- 13k) Please see Chapter II.B, Addenda to the Draft EIR/EIS, for changes to p. 85 of the Draft EIR/EIS to indicate that City Hall West contained City offices for about 10 years.
- 13l) Figure 8 of the Draft EIR/EIS should indicate that the land use designation for the Plaza Building is "Commercial Core" under the Central District Urban Renewal Plan.

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- 13m) The commenter is correct in noting that the Plaza Building is not included in Alternatives 1 and 2, as depicted in Figures 10 and 11 of the Draft EIR/EIS. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for revised Figures 10 and 11 of the Draft EIR/EIS.
- 13n) The description of the Rotunda Building on p. 117 of the Draft EIR/EIS is taken from the City's architectural survey of the Downtown District (City of Oakland, 1985), which also states that the original portion of the Rotunda Building has a parapet wall above its cornice. A review of photographs of the building indicates that the original portion has a partial additional upper level.
- 13o) The commenter is correct. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for changes to p. 117 of the Draft EIR/EIS.
- 13p) The reference to 1239 Broadway is apparently correct, based on a city directory and a 1902 Sanborn map referenced in the archaeological resources background report for the Draft EIR/EIS (David Chavez & Associates, 1994). Based on a review of Sanborn maps, the street addresses along Broadway were adjusted at some point between 1902 and 1912. To clarify this issue, please see Chapter II.B, Addenda to the Draft EIR/EIS, for changes to p. 129 of the Draft EIR/EIS.
- 13q) The I-980/I-580/SR 24 interchange is approximately one mile (not ¼ mile) east along I-980 from the 18th Street ramp. (As stated in response to Comment J-9, above, I-980 is an east-west route in the project area vicinity.) The I-580/I-80 interchange (the "Oakland maze") is about 1.8 miles west along I-580 from the I-580/I-980 interchange. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for changes to p. 147 and p. 149.
- 13r) The referenced program did go into effect on July 1, 1994. Please also see the following response.
- 13s) As noted in the previous comment, the Bay Area Air Quality Management District (BAAQMD) rule requiring certain minimum vehicle occupancy went into effect in Alameda County, including Oakland, on July 1, 1994. The Employer Trip Reduction Plan discussed on p. 156 of the Draft EIR/EIS is a plan that, if required by the BAAQMD, would be submitted to the district. The City was to conduct its first employee transportation survey under the newly enacted BAAQMD regulation in late 1994; no Employer Trip Reduction Plan would be required if the results obtained were comparable

to those obtained in the May 1993 survey. As noted on p. 205 of the Draft EIR/EIS, the City has already voluntarily implemented a program to limit single-occupancy vehicle trips by City employees commuting to and from work; this program has been in place since 1993.

- 13t) The load factors presented in Table 15 of the Draft EIR/EIS is correct. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for changes to p. 160 of the Draft EIR/EIS.
- 13u) The commenter is correct in noting that some bus stops are not included in Figure 24 of the Draft EIR/EIS. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for revised Figure 24 of the Draft EIR/EIS.
- 13v) The commenter is correct. AC Transit line 40L (which is the line 40 peak-hour designation) operates at peak-hour headways of 12 to 15 minutes, not 20 minutes as shown in Table 16. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for changes to Table 16, p. 164 of the Draft EIR/EIS.
- 13w) Please see Chapter II.B, Addenda to the Draft EIR/EIS, for revisions to Mitigation Measures GEO-4 and SERV-2.1 that standardize the discussion of applicable codes.

Regarding Policy 3.11 of the Historic Preservation Element, as noted by the commenter, this policy is broader than Policy 3.10, which is included on p. 92 of the Draft EIR/EIS because the project is proposed in response to damage sustained by City Hall Annex in the 1989 Loma Prieta earthquake. It should be noted that the two policies are intended to prevent adverse effects to historic properties as a result of repair and retrofitting. Both policies cite the same prevailing codes.

- 13x) The commenter is correct; the labels in the two diagrams in Figure 33 on p. 227 of the Draft EIR/EIS, should refer to "Alternative 5" and "Alternative 6" (not "Alternative 3" and "Alternative 4"). Please see Chapter II.B, Addenda to the Draft EIR/EIS, for changes to Figure 33, p. 227 of the Draft EIR/EIS.
- 13y) As noted in the response to Comment C-1, p. 60 of this Final EIR Addendum, some businesses that were on the Dalziel block at the time the Draft EIR/EIS was published have since closed or relocated, including one book store. As stated in that response,

IV. Written Comments and Responses

Alternatives 1, 1A, and 2 would displace seven retail businesses in two buildings and 12 upper-story tenants, mostly artists, in the Pardee Building. For Alternative 3, one retail and at least two upper-story tenants have moved out of a building on the Miller Building block. For Alternative 6 (as revised in this Final EIR Addendum), one retail tenant would be displaced. With Alternative 6, about 385 parking spaces would be lost (not 335 as stated in Table 23 on p. 278 of the Draft EIR/EIS). Please see also the revised parking analysis in Chapter II.B, Addenda to the Draft EIR/EIS.

13z) Project approvals are discussed in Chapter IV, pp. 33-34 of the Draft EIR/EIS, as amended (see Chapter II.B, Addenda to the Draft EIR/EIS, of this Final EIR Addendum).

13aa) The commenter is correct. Please see Chapter II.B, Addenda to the Draft EIR/EIS for changes to p. 305 of the Draft EIR/EIS.

13bb) For purposes of distinguishing them from the aerial photo in Figure 65 on p. 307 of the Draft EIR/EIS, Figures 71 and 72 on pp. 313 and 314 of the Draft EIR/EIS are considered "ground-level" even though they are taken from the sixth floor of the Plaza Building.

13cc) Please see Chapter II.B, Addenda to the Draft EIR/EIS, for corrections to p. 351 and p. 352 of the Draft EIR/EIS.

13dd) The commenter is correct. Please see Chapter II.B, Addenda to the Draft EIR/EIS for changes to p. 370 of the Draft EIR/EIS.

13ee) Please see Chapter II.B, Addenda to the Draft EIR/EIS, for revised text on cumulative impacts on p. 370 of the Draft EIR/EIS.

13ff) The Secretary of the Interior's Standards for Rehabilitation as quoted in Appendix E of the Draft EIR/EIS is the current (1990) version published by the National Park Service.

REFERENCES (Letter J)

Caltrans, 1993. "1992 Ramp Volumes on the California State Freeway System. District 4." May.

City of Oakland, 1985. Downtown District survey. Compiled by the Oakland Cultural Heritage Survey, a project of the City Planning Department.

IV. Written Comments and Responses

David Chavez & Associates, 1994. "Archaeological Resources Investigation for the Oakland Administration Building Project, Oakland California."

Hughes, Kathryn, Employee Transportation Coordinator, City of Oakland, telephone conversation, September 26, 1994.

V. PUBLIC TESTIMONY AND RESPONSES TO PUBLIC TESTIMONY ON THE DRAFT EIR/EIS

The following is a summary (not a verbatim transcription) of the public hearing on the Draft EIR conducted by the Oakland City Planning Commission on August 24, 1994. Comments on the adequacy of the Draft EIR/EIS are numbered in the margin. For purposes of sequential reference with the written comments, these comments are designated as though they were contained in a comment letter K. Therefore, Comment 1 from the public hearing is answered in response K-1, and so on. Responses to the public hearing comments follow the end of the public hearing summary.

K. PUBLIC HEARING COMMENTS

EZRA RAPPORT, DEPUTY CITY MANAGER: I have previously given a complete presentation on the project and will summarize for this meeting. The project has gone through a two-year planning process. Many more alternatives were looked at during that process than those that appear in the EIR. The EIR examines the alternatives with the greatest impacts. The primary effect of the project will be on historic preservation. The planning process was based on four primary criteria: Cost, Administrative Efficiency, Economic Development and Removal of Blight around City Hall, and Urban Design and Historic Preservation Issues. The preferred alternative (#1) [now 1A] would demolish three buildings on the Taldan Block that are red-tagged since the 1989 earthquake and not suitable for renovation or for City offices because they do not have enough space and because the floor plates are on different levels. On the Dalziel block, the preferred alternative would demolish the Dalziel building, which is damaged too badly to be saved. This alternative would retain the facade of the Pardee Building as a replication, and would retain the historic interior of the Broadway Building. All of the design-build team architects have historic preservation representatives on their teams. The design-build competition will involve the designs going before a jury, receiving public comment and receiving City Planning Commission comment before they go before the City Council.

CHAIRMAN DELUCA: What is the height of the proposed buildings?

EZRA RAPPORT: The project has been downsized compared what is in the EIR; the EIR analysis began several months ago. It would be about 325,000 net square feet in the two

buildings combined. The Taldan Block building would be one story lower than the Broadway Building, and the Dalziel block building would be set back from the Plaza Building, which will remain, and would be lower than the Plaza Building.

1
Cont.

COMMISSIONER ROWE: The State Office Building must be included in the EIR, in the figures as well as in the text, including 15th Street, which would be closed.

2

COMMISSIONER SMITH: The visual simulations should show the downsized building.

3

MARY WARREN, CHAIR, BOARD OF DIRECTORS, OAKLAND CHAMBER OF COMMERCE: Read letter of comment ["Statement"] on Draft EIR/EIS dated August 24, 1994.

4

MICHAEL SCHAFFER: I am a resident of Adams Point. The redevelopment of City Hall Plaza is a positive step, but buildings to be demolished on the Dalziel block should be protected. Mixed-use development should be preserved downtown. There is an opportunity to create more housing at that site. Alternative 4 in the EIR/EIS could, with some modification, be made to suit the City's needs. As for the buildings on San Pablo Avenue, ground-floor retail with residential above should be maintained. Alternative 6 in the EIR/EIS is also attractive.

5

FREDERICK HERTZ: I am speaking for myself, and not representing any organization or other persons. First, the EIR is defective because no real preservation alternative was studied. It is discussed briefly on pp. 31-32 with other alternatives that were not studied fully due to a staff decision, but the EIR should study this. If it's very expensive, the EIR should analyze this. Second, if five buildings are going to be demolished, the City Planning Commission must look seriously at mitigation. For example, you should require restoration of the Rotunda and maintenance of City-owned buildings. There is a hole in the side of the Rotunda Building that has been there for several years. There is no one person whom the City Planning Commission can call to say "fix this hole." If the City is going to remove five buildings, the City should try to ensure that other buildings are retained through such means as loan programs and technical assistance to building owners for restoration. You should save a portion of the Pardee Building on the San Pablo frontage. In recent meetings, staff has committed to do at least half the items recommended by preservationists. But these items should be made required mitigations by the City Planning Commission.

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BRADLEY WIEDMAIER: I am a resident of the Central Business District. This plan does not give enough consideration to San Pablo Avenue between 15th and 16th Streets and the interaction of the proposed project with City Hall. Buildings on the Taldan Block could be incorporated into the project. Full-block developments are not where it's at now. The current strategy is contextualism. Some buildings might have to come down, but not all should. The City might consider a "linear" Civic Center. The EIR doesn't adequately consider historic buildings.

8

ANNALEE ALLEN, MEMBER, LANDMARKS PRESERVATION ADVISORY BOARD: I would like some clarification. What is the role of the Landmarks Board in the Design-Build competition.? Also, the State Office Building should be addressed in the Final EIR.

9

EZRA RAPPORT: It is possible that there will be a joint City Planning Commission-Landmarks Board meeting to consider the project in the design-build phase.

ANTHONY DUBOVSKY: I am a painter and have been a Pardee Building tenant for 21 years. The report does not adequately deal with the cultural component of artists working downtown. I support the administration building concept, but it should combine old and new. There are alternatives that will leave the Pardee Building intact. We have an agreement to move to the Plaza Building after three years. But there is a very good chance that this move will destroy the artists' community, despite the City's invitation to come back. The City Planning Commission should look at other alternatives in the EIR, because you can combine the old and the new.

10

CARL ANDERSON: What criteria were used to determine that Alternative 1 is the preferred alternative? I would like a comparison to Alternative 4, in regard to the criteria listed on p. 13 as to why Alternative 1 is preferred. Can the preservation of the Rotunda Building with its less-than-ideal floor plan be weighed against the destruction of historic buildings? In regard to the displacement of existing land uses, I would like the analysis to include the cultural contribution of the existing bookstores to downtown Oakland. The report says there are five bookstores in the Pardee Building. I don't know of any other buildings that have five bookstores. The loss of the bookstores would be a significant impact. Would the loss of the bookstores require mitigation under Title 40 of the Code of Federal Regulations? And if the loss of the bookstores were a significant impact, would the conditions that resulted in the clustering of bookstores serve as appropriate mitigation? Also, as for temporary relocation of the businesses, is this an impact (and not mitigation as stated in the report)?

11

12

COMMISSIONER ROWE: The Final EIR needs to include the State Office Building, the historic issues brought up at this hearing, the bookstores, and relationship of Alternative 1 to Alternative 4. 13

COMMISSIONER SMITH: Mr. Anderson should submit his comments in writing.

K. RESPONSES TO PUBLIC HEARING COMMENTS

- 1) For a complete description of Alternative 1A (Reduced Program), which is referenced in the comment, please see Chapter II.A, Addenda to the Draft EIR/EIS, of this document.
- 2) The proposed State Office Building is discussed in several locations in the Draft EIR/EIS. It acknowledges that the State Office Building is planned for the same site as Alternative 3 in the Introduction (p. xii of the Draft EIR/EIS), in a footnote to the description of Alternative 3 (p. 19 of the Draft EIR/EIS), and in the Summary on p. S-9 of the Draft EIR/EIS. The closure of 15th Street west of Clay Street, which would be required for the proposed State Office Building and for Alternative 3 of the City Administration Building, is included in the project description on p. 11 of the Draft EIR/EIS. The closure of 15th Street west of Clay Street also is included as part of the transportation analysis in Chapter VI. The proposed State Office Building is specifically included in Chapter VI (Environmental Impacts / Consequences) in the cumulative analysis of issues related to building massing and intensity of development, including wind, architectural resources, visual quality and urban design, fire protection, and transportation and parking, as well as in the land use analysis. Because the analyses of air quality and noise are largely derived from traffic impacts, the proposed State Office Building also is accounted for in those cumulative analyses. The proposed State Office Building is not specifically included in the discussion of site-specific issues such as geology, hydrology, or hazardous materials, although the site is included as the site of City Administration Building Alternative 3.

The proposed State Office Building was not included in the shadow analysis for the City Administration Building because shadow effects are not additive in the same sense as wind or transportation. (In other words, once a space is shaded, it cannot be "more" shaded, whereas wind or traffic can be increased further at the same place or intersection.) In addition, the proposed State Office Building would not cast shadows on any of the publicly accessible open spaces examined in the Draft EIR/EIS, at the times examined (between 10:00 a.m. and 3:00 p.m.), and thus would not result in a significant effect based on the significance criteria stated on p. 220 of the Draft EIR/EIS. The proposed State Office Building could newly shade City Hall Plaza in the late afternoon in late May, June and July; during these times, City Hall would already shade much of the Plaza.

Regarding the inclusion of Alternative 3 in the Draft EIR/EIS, it should be noted that the City and the State have not yet signed an agreement regarding disposition of the site for the

proposed State Office Building. Although environmental review of the State Office Building is under way, no project has yet been approved. Finally, the City Advisory Committee that studied alternatives for the City Administration Building project in 1992 considered the City Hall West-Miller Building site, where Alternative 3 would be located.

Revised Figure 2, p. 11 of this Final EIR Addendum, shows the location of the proposed State Office Building.

- 3) As noted in the analysis of Alternative 1A (Reduced Program), effects on Urban Design and Visual Quality were analyzed in the Draft EIR/EIS based on *generalized* building masses (see p. 303 of the Draft EIR/EIS and the note attached to each visual simulation). Because of the conceptual nature of the visual simulations, simulations of Alternative 1A would result in a *generalized* appearance (at the level of detail presented in the simulations) substantially similar to that of Alternative 1 presented in Figures 66, 72, 74, 76, and 79 of the Draft EIR/EIS, and would serve little useful purpose in the analysis of visual impacts of Alternative 1A. The reduced program would not result in any new or more severe impacts, and impacts on visual quality and urban design related to demolition of existing structures and construction of new, larger structures would be significant and unavoidable for Alternative 1A, as they would for Alternative 1.
- 4) The speaker's comments were identical to those in comment letter F. Please see the response to Comment F-1, p. 77.
- 5) The comments do not address the adequacy of the Draft EIR/EIS, and no response is necessary. For information, pp. 275-276 of the Draft EIR/EIS describes the change in land use that would occur with implementation of the project. As stated in the response to Comment C-1, p. 60 of this document, the Draft EIR/EIS analyzes environmental effects of the project alternatives, but does not analyze operational differences between alternatives. The City Council, as the City decision-making body, will have the responsibility for comparing alternatives both on environmental and operational grounds and selecting one alternative (including, potentially, the No-Project Alternative) for approval. Regarding the commenter's discussion of housing, it should be noted that neither the Oakland *Comprehensive Plan* nor the Zoning Regulations provide for housing on the alternative project sites.
- 6) Please see the response to Comment A-1, p. 49 of this Final EIR Addendum.

V. Public Hearing Comments and Responses

- 7) Please see Chapter II.B, Addenda to the Draft EIR/EIS, for new Mitigation Measure HIST-5d, Downtown District preservation incentives, which is added to p. 295 of the Draft EIR, and Mitigation Measure HIST-6b, Rotunda Building rehabilitation, which is added to p. 296. Please see also the responses to Comments A-2 and N-1, p. 49 and p. 144, respectively, of this Final EIR Addendum. Regarding the Pardee Building, it should be noted that the preferred project as currently proposed would include a setback on the San Pablo Avenue frontage of the Dalziel block at approximately the height of the existing Pardee Building to recall the Pardee Building facade.
- 8) San Pablo Avenue is discussed extensively throughout the Draft EIR/EIS. For example, the document states on pages 12, 17, 22, and 27 of the Draft EIR/EIS, those alternatives that would be developed at least in part along San Pablo Avenue between 15th and 16th Streets would include ground-floor retail space. Potential displacement of existing land uses is discussed on pp. 277-279 of the Draft EIR/EIS. (Please see also the response to Comment C-1, p. 60.) Effects on architectural resources along San Pablo Avenue are described on pp. 281-283, pp. 285-286, and pp. 287-295 of the Draft EIR/EIS. Several visual simulations (*e.g.*, Figures 66, 67, 70, and 79-81) graphically illustrate potential Urban Design and Visual Quality effects. The project's interaction with City Hall is discussed in the analysis of Urban Design and Visual Quality, pp. 331-332 of the Draft EIR/EIS. Many of the visual simulations (*e.g.*, Figures 66-70, 79-81, 85, and 87) graphically illustrate effects of the project in the context of City Hall. Historic buildings are a major focus of the analysis in the Draft EIR/EIS; see Sections V.D.1 and VI.D.1, Architectural Resources.

Regarding the commenter's opinions on the design philosophy of the project, those comments do not address the adequacy of the Draft EIR/EIS, and no response is necessary.

- 9) As noted by City staff at the public hearing, in response to the commenter's question, there may be a joint meeting of the City Planning Commission and Landmarks Preservation Advisory Board to consider the project in the design-build phase.

Regarding the proposed State Office Building, please see the response to Comment K-2, above.

- 10) Please see the response to Comment C-1, p. 60 of this Final EIR Addendum.

- 11) Please see the response to Comment D-2, p. 67 of this Final EIR Addendum.
- 12) Please see the response to Comment D-3, p. 68 of this Final EIR Addendum.
- 13) Regarding the proposed State Office Building, please see the response to Comment K-2, above. Please see the response to Comments A-1, A-2, p. 49 of this Final EIR Addendum, and Comment N-1, p. 144 of this Final EIR Addendum, in regard to the Draft EIR/EIS analysis of a historic preservation alternative and recommended City actions to reduce effects on the Downtown District. Please see also Chapter II.B, Addenda to the Draft EIR/EIS, for new Mitigation Measure HIST-5d, Downtown District preservation incentives, which is added to p. 295 of the Draft EIR, and Mitigation Measure HIST-6b, Rotunda Building rehabilitation, which is added to p. 296. For a discussion of effects related to relocation of the bookstores in the Pardee Building, including potential economic impacts, please see the response to Comment C-1, p. 60. Regarding the criteria by which Alternatives 1 and 4 were evaluated, please see the response to Comment D-2, p. 67.

**VI. COMMENTS DURING SUPPLEMENTAL COMMENT PERIOD AND
RESPONSES TO SUPPLEMENTAL COMMENTS**

November 15, 1994

RECEIVED

NOV 17 1994

**CITY PLANNING COMMISSION
ZONING DIVISION**

Ms. Anu Raud
Environmental Review Coordinator
City of Oakland
Office of Planning and Building
421-14th Street, Room 100
Oakland, CA 94612

**SUBJECT: Oakland City Administration Building
Draft Environmental Impact Report / Draft Environmental Impact Statement**

Dear Ms. Raud:

Thank you for the opportunity to review the subject environmental document. The District has the following comments regarding water service and wastewater service.

WATER SERVICE

This project may impact the District's finite water supply. To help mitigate the impact of additional water demands, the District recommends that water conservation measures be required as a standard feature in the design and construction of the proposed project. The District encourages the use of equipment, devices, and methodology for plumbing fixtures which will provide for long-term, efficient water use. For water conservation measures, State law and local ordinances should also be implemented in addition to State Department of Water Resources recommendations listed in the mitigation for Impact SERV-3.1 on pages S-36 and 338.

Off-site pipeline improvements, at applicant expense, may be required to meet project demands, particularly fireflow demands. The size and location of any replacement would be determined by the District, not the project mechanical engineer as stated in the mitigation measure for Impact SERV-2.2 on page 336. If the pipeline improvements or relocations are required, the extent, location, and cost would vary according to the alternative selected. Locations other than those shown in Impact SERV-3.2 on pages S-36 and 339 may also be affected. The feasibility of shoring the existing water system pipelines would have to be evaluated by the District before the shoring and supporting the pipelines in lieu of relocation is determined to be acceptable to the District. The structural condition of some of the existing pipelines may not permit proposed suspending of the pipelines as a construction mitigation. At some locations, due to the improvements in the vicinity of the pipelines, replacement pipelines may have to be installed in casings. The project sponsor should contact the District's New Business Office for a water service estimate (WSE). The WSE will provide information on the costs and conditions for the water system improvements necessary to serve the project. Should pipeline relocations or

Ms. Anu Raud
November 15, 1994
Page 2

improvements be required, the project sponsor should include adequate lead time in the project schedule for the design and installation of the new pipelines.

2
Cont.

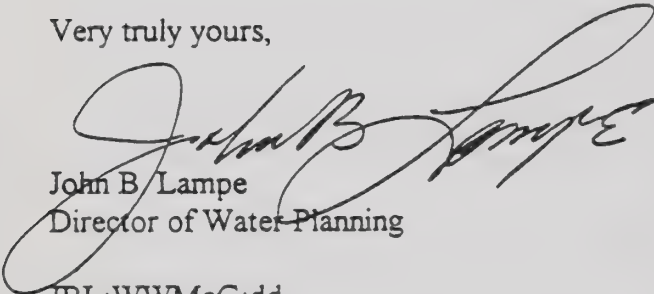
WASTEWATER SERVICE

Information on the wastewater that would be generated by this project is needed to determine the impacts to the wastewater system. The necessary information includes average day flow, peak flow, maximum day flow, and wastewater characteristics and concentrations. Also, information on the increased discharges to the stormwater system is needed. While the mitigation measure for Impact SERV-4.2 on page 342 states that any new sanitary and storm sewer systems should be consistent with the objectives of the EBMUD Infiltration/Inflow Program, the flowrates and quantities are needed based on amounts of impervious surfaces.

3

If you have any questions, or if the District can be of further assistance, please contact William W. McGowan, Jr., Associate Civil Engineer, Water Service Planning, at (510) 287-1031.

Very truly yours,



John B. Lampe
Director of Water Planning

JBL:WWMcG:dd
9438.wp6

Letter L (John B. Lampe, Director of Water Planning, East Bay Municipal Utility District)

- 1) Comment noted. Please see Chapter II.B, Addenda to the Draft EIR/EIR, for changes to Mitigation Measure SERV 3-1 on pp. S-36 and 338 of the Draft EIR/EIS.
- 2) The Draft EIR/EIS states, on p. 336, that water supply pipes in the project vicinity could require upgrading to meet fire suppression and potable water requirements. The discussion beneath Mitigation Measure SERV-2.2 states that the City, as project sponsor, would coordinate with the East Bay Municipal Utility District (EBMUD) in design and construction of replacement pipelines.

Impact SERV-3.2 on p. 339 of the Draft EIR/EIS specifically discusses potential effects on underground water lines where construction in a street right-of-way could occur, for an underground loading dock in San Pablo Avenue and/or underground parking beneath 15th Street. (As noted in Chapter II.A., Reduced Program, of this Final EIR Addendum, and in response to Comment J-5, p. 112 of this Final EIR Addendum, an underground loading dock beneath San Pablo Avenue is not now likely to be constructed.) Mitigation Measure SERV-3.2 on p. 339 of the Draft EIR/EIS states that the project sponsor shall plan and coordinate the location and/or structural reinforcement of water supply lines with EBMUD. Should additional water lines require relocation and/or reinforcement, the project sponsor would also work with EBMUD.

- 3) Regarding wastewater, Impact SERV-4.1, Draft EIR/EIS pp. 340-341, provides an estimate of maximum daily and annual wastewater flow. As stated on p. 340, peaks in wastewater flow would correspond to peaks in water usage, and actual demand would be in part a function of water facilities installed. No information is available at this time regarding details of building design because the building design would not be fully developed until after completion of the EIR. As stated on p. 342, infrastructure plans for wastewater and water supply lines would have to be reviewed and accepted by EBMUD.

Regarding storm drainage, Impact HYDRO-1 on p. 182 of the Draft EIR/EIS states that, because each of the "build" alternatives would replace existing impervious surfaces, the volume of storm drainage from the site after construction would be approximately the same as pre-project levels, and there would be no impacts related to the volume of runoff.

DEPARTMENT OF GENERAL SERVICES

OFFICE OF PROJECT DEVELOPMENT AND MANAGEMENT

400 R STREET, SUITE 5100

SACRAMENTO, CA 95814



November 18, 1994

Anu Raud
Environmental Review Coordinator
City of Oakland Office of Planning and Building
421 - 14th Street, Room 100
Oakland, CA 94612

Dear Ms. Raud:

COMMENTS ON CITY ADMINISTRATION BUILDING EIR/EIS, SCH 93091065

Thank you for extending the opportunity to comment on the Oakland City Administration Building EIR/EIS, and for meeting with us last week to discuss environmental concerns relating to both the City's and the State's proposed office building projects.

Our comments concern two environmental elements in the City's document: Cultural Resources and Noise:

Cultural Resources

1. We disagree with the conclusion that even if the City's project were to be designed in accordance with the Secretary of the Interior's Standards for Treatment of Historic Properties, the impact of an office building project on the historic district would remain a significant unavoidable impact. Our approach is if the design of the City's project follows the Secretary of the Interior's Standards, the impact of the project upon the historic district would be mitigated to a less than significant level.

2. With specific reference to the City's Alternative Site #3 (the State's proposed office building site), we refer to the Draft Historic Resources Element of the City's General Plan (September 30, 1993). This Element defines an Area of Primary Importance (API) wherein two-thirds of the properties are designated as contributory (C), or higher; APIs qualify as eligible as National Register Districts. It is noted that the 2-block site bounded by 14th, 16th, Clay and Jefferson contains 18 properties, 10 of which are classified as contributory. This represents less than two-thirds of the total properties (55%). Two of the structures, the Coakley Hotel and the Tucker Building are presently isolated and surrounded by vacant lots. Based on existing conditions, it is our position that these blocks, due to the demolitions required as a result of the 1989 Loma Prieta earthquake, justify reevaluation to determine if they should remain included within the boundaries of the historic district. The historic character of these blocks has been significantly reduced by the required demolitions and the resulting existing conditions.

Noise

It is not clear if noise is significant, particularly with respect to the City's Alternative #3 site. Table S-3, page S-15, states noise increases along local roadways serving the proposed project could not be mitigated and would remain a significant impact. However, on page 16, it is stated that project operational noise due to vehicle traffic would not be significant with mitigation, such as nonoperable building windows. Table 22 on page 215 indicates that Alternative #3 results in an imperceptible (1 dBA or less) increase over 1997 and 2000 Baseline levels. Rather, it appears the street closures proposed as part of the City Hall Plaza urban design master plan generate overall increased noise levels in the area. However, even with the street closures, noise level the areas of residential concentration along 14th Street and 16th Street remain imperceptible.

3

The State is proceeding with preparation of our Draft EIR for the Elihu M. Harris State Office Building on portions of the 2-block site bounded by 14th, 16th, Clay and Jefferson. We look forward to continuing to work with the City of Oakland and your office.

Sincerely,



Christal Waters
Senior Environmental Planner

c: Albert King, OPDM Project Director
Sally Maxwell, Woodward-Clyde Consultants

VI. Supplemental Comments and Responses

Letter M (Christal Waters, Senior Environmental Planner, California Dep't. of General Services)

- 1) As stated in the discussion following Impact HIST-5, Draft EIR/EIS pp. 287-293, each of the "build" alternatives would demolish buildings contributory to the Downtown District and would replace those buildings with one or more substantially larger new buildings that would not be contributory to the district. As stated in the Draft EIR/EIS, the combined effect of demolition and new construction could compromise the historic fabric and integrity of the Downtown District as currently mapped. As stated on p. 295, implementation of mitigation measures identified in the Draft EIR/EIS, including design of the project in accordance with the Secretary of the Interior's Standards, would reduce the project's effects on the Downtown District. However, the EIR authors concluded that, because of the substantial alteration to the Downtown District that would occur with any of the "build" alternatives, as described on pp. 287-293 of the Draft EIR/EIS, this impact would remain significant after mitigation.
- 2) The Draft EIR/EIS notes, on p. 289, that construction of Alternative 3 would be at the western edge of the Downtown District, where prominent buildings such as City Hall West and the Miller Federal Building have already been demolished, and that this alternative would therefore not have as much effect on the remainder of the Downtown District as would the other "build" alternatives, which would include demolition and construction near the center of the Downtown District. However, this alternative could affect the visual prominence of the Hotel Touraine, a primary district contributor, and would effectively isolate the remaining district contributors on the City Hall West block, including the Hotel Sutter, the Hotel Savoy Cafeteria, the Jefferson Inn (Hotel Savoy), and the Hotel Oaks, all located on the western half of that block, as noted on p. 289. While it is true that building demolitions that have occurred since the Downtown District survey was completed in 1985 have altered the district, no subsequent survey has been prepared. Therefore, the Draft EIR/EIS concludes that Alternative 3 could compromise the historic fabric and integrity of the Downtown District as currently mapped.
- 3) The Draft EIR/EIS traffic analysis conservatively assumes the closure of 15th Street between Clay Street and City Hall Plaza and the prohibition of through traffic via 15th Street, City Hall Plaza and San Pablo Avenue as part of the City Hall Plaza reconstruction component of the City Administration Building project. The resulting redistribution of traffic with this closure would generate higher traffic volumes (and resulting traffic noise) on Clay Street than would otherwise occur if through traffic were permitted to travel via

15th Street and San Pablo Avenue, as might occur with the project as now envisioned. (See Chapter II.B, Addenda to the Draft EIR/EIS, for a revision to the text of p. 11 regarding street closures.)

As noted in the discussion of Impact NOISE-4 on pp. 214-217 of the Draft EIR/EIS, most of the increase in traffic-related noise would occur due to redistribution of traffic resulting from street closures, including closure of 15th Street between Clay Street and City Hall Plaza and closure of San Pablo Avenue to through traffic south of 16th Street. Noise increases due to project-generated traffic would be 1 dBA or less, and would not be perceptible by themselves. As stated on p. 216, future "baseline" noise levels would be "normally unacceptable" for residential uses along Clay Street and 14th Street, largely due to redistributed traffic. Noise effects on residences on 16th Street would not be significant, nor would noise effects on offices uses, including the City Administration Building and proposed State Office Building, as noise levels would be "normally acceptable" or "conditionally acceptable" for new offices uses, as stated on p. 216 of the Draft EIR/EIS.

The Draft EIR/EIS notes, on p. 217, that the noise analysis is conservative, relying in part on noise standards for new construction. The Draft EIR/EIS also states that the analysis is based on modeling of traffic noise only, while actual noise levels could vary somewhat, given varying street widths and noise attenuation characteristics of existing buildings. With those considerations, the Draft EIR/EIS concludes that the increase in project-related traffic noise due to redistribution of non-project-generated traffic, in conjunction with the incremental increase in noise due to project-generated increases in traffic volumes and increases in traffic noise due to background traffic growth, would constitute a significant and unavoidable cumulative impact, to which the project would contribute.

The statement on p. 16 of the Draft EIR/EIS that operational noise would not be significant is incorrect as the result of an editing error. Please see Chapter II.B, Addenda to the Draft EIR/EIS for changes to p. 16 of the Draft EIR/EIS.



November 18, 1994

Anu Raud
Environmental Review Coordinator
Office of Planning and Building
421 14th Street, 1st Floor
Oakland, CA 94612

Re: ER-92-7/Oakland City Administration Building

Oakland Heritage Alliance submitted comments to the above referenced draft EIR during the comment period which ended August 29, 1994. The following comments are a result of discussions with the City Manager's Office and the Office of Economic Development and Employment about mitigations for the adverse effects which the preferred alternative would have on the National Register eligible downtown historic district, and are supplementary to those contained in our letter of August 26, 1994.

INCENTIVES PROGRAM FOR DOWNTOWN HISTORIC DISTRICT
(Mitigations for City Hall Administration Building Project)

1. Nominate the Historic Downtown District to the National Register of Historic Places to provide threshold eligibility for use of the federal tax credits and charitable deductions for conservation easement grants. Prior to preparing and submitting the nomination, review and adjust district boundaries as necessary taking into account any demolitions which have occurred or which will take place as a result of the administration building project. 1
2. Develop and implement a Facade Improvement Program for contributing buildings in the district, including identification of 2-4 block target area, specific design guidelines, design assistance, financial assistance (revolving loan fund, matching grants, fee reduction for pre-qualified applications), and soliciting property and business owners for participation.
3. Establish a Revolving Loan Fund for rehabilitation, seismic upgrade, and facade improvements.

4. Offer Facade Improvement Matching Grants for participants in the program in a total amount of \$250K-\$350K (depending on the size and number of buildings in the target area) with a \$20,000 cap per building.

5. Develop a Mills Act contract program (property tax relief) for the district.

6. Prepare promotional and marketing materials emphasizing the historic character of downtown including a brochure on downtown landmarks/districts, walking tours, a historic preservation component to general marketing brochures, a local history component to Public Art Master Plan and a brochure describing federal, state and local incentives for historic preservation.

7. Include a historic preservation component in business retention and attraction efforts, including an ongoing inventory of space available in historic buildings and properties which are available and qualify for using the incentives.

8. Provide qualified staff or consultant services to develop and implement the incentives program, handle referrals for technical assistance, and oversee construction/building management for city-owned historic buildings.

Thank you for the opportunity to comment, again.

Very truly yours,



Carolyn Douthat
Preservation Action
Committee

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Cont.

Letter N (Carolyn Douthat, Preservation Action Committee, Oakland Heritage Alliance)

- 1) Several commenters on the Draft EIR/EIS have noted that, since the project would require the demolition of several existing buildings, the City should take steps to mitigate the project's impact on the Downtown Historic District. In response to these concerns, City staff has met extensively with representatives of local historic preservation groups.

As a result of these discussions, City staff and local preservationists have jointly developed a proposed package of historic preservation incentives. The incentives package was carefully designed to promote both historic preservation and economic revitalization, in a way that remains sensitive to the City's limited staff and funding. While the incentives package would not fully mitigate effects of the proposed project to a less-than-significant level, since the demolition of contributory buildings and construction of new non-contributory building(s) would still occur, the package would enhance the remainder of the district. The incentives package is added to the EIR as a new Mitigation Measure HIST-5d. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for this addition to p. 295.

If Alternative 4 (Taldan/Rotunda) were not selected for the City Administration Building project, the City would commit to an aggressive timeline for rehabilitation of the Rotunda Building. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for this addition to p. 296.

In addition to the incentives package and the Rotunda Building schedule, the City would also make certain other assurances with respect to historic preservation.

Broadway Building Restoration

The City Council would formally commit to repairing the Broadway Building's interior and exterior, in accordance with the Secretary of the Interior's Standards for Rehabilitation, as provided in the preferred alternative of the City Administration Building, and included in Mitigation Measure HIST-2 on p. 284 of the Draft EIR/EIS. In addition, the City would commit to using a portion of the ground floor for some public service use (e.g., a visitor's center). Finally, the City would continue discussions with BART in order to incorporate the restoration and expansion of the BART entrance into the City Hall Plaza design.

Preservation Participation in Design of Administration Building

The City intends to follow the AIA Handbook of Architectural Design Competition as guidelines for jury selection. A seven--person jury is contemplated, which would allow for the inclusion of at least one jurist with preservation interests. The City intends to have at least one of the other jurists be a professional or academic with extensive experience in urban planning and design. The City also would make a good faith effort to include a jurist with experience in in-fill development in historic areas. The City would work with local preservationists to identify qualified individuals for the design-build jury.

Oakland City Planning Commission
Attention: Anu Raud, Environmental
Review Coordinator
Oakland City Planning Department
421 14th Street, 1st Floor
Oakland, CA 94612

November 14, 1994



re: MORE COMMENTS ON DRAFT EIR/EIS FOR CITY ADMINISTRATION BUILDING

Dear Ms. Raud and Commissioners:

In my August 29 letter to you I made numerous comments on the Draft EIR/EIS regarding a new City Administration Building, or Buildings, in downtown Oakland. Now I've received a communication saying that the City has granted an extra 15-day period for public comments. Accordingly, I wish to make these additional remarks.

Environmentally Superior Alternatives

The Draft EIR/EIS admits that the "Existing Buildings on Taldan and Dalsiel Blocks" option is "an environmentally superior alternative," but the City withdrew that option from detailed consideration because of its alleged infeasibility. Of the options that are considered in detail, the draft identifies Alternative 4 as environmentally superior. Some wording on pages S-11 and 24 may imply that (although not as good as Alternative 4) Alternative 5 also is environmentally better than the City's "preferred" Alternative 1. The status of Alternative 5 in this regard should be clarified.

However, it should be acknowledged that the draft's Alternative 6 also is environmentally superior to Alternative 1.

The obvious key difference between Alternatives 1 and 6 can be stated very briefly. Alternative 1 would destroy the historic Pardee Building (and disrupt that building's special community of artists and booksellers) while it would keep the undistinguished Clay Street Garage (and retain that garage's wastefully unsuitable ground-level parking on a prime site). Alternative 6 would do precisely the opposite. And by doing so it would represent just the kind of priority-shifting that's needed, in these hopefully wiser waning years of the 20th Century, to help make cities both environmentally and culturally sustainable.

Alternative 6 could be made even more environmentally superior if, as I suggested in my earlier letter, it were modified so as to retain the southern 40 or 50 feet of the Dalsiel Building (and make that functionally part of the City Administration Building).

Mistakes in "Impact HIST-5" Description

The Draft EIR/EIS's description of "Impact HIST-5" contains some incorrect statements to the detriment of Alternatives 4, 5, and 6. The first full paragraph on page 291 alleges that Alternative 4 would remove three "contributory buildings," but in fact the Woodward Building is the only such structure that it would eliminate. (The KCR and Money Back Smith Buildings, which it would also remove, are only contingency contributors.) Conversely, that paragraph's remark that Alternative 4 would leave standing only 26 of the original 35 "contributors" west of Broadway/Telegraph Avenue appears to understate by at least two the number of contributors that would survive.

The first full paragraph on page 292 makes exactly the same mistakes regarding Alternative 5. The third full paragraph on page 293 says that Alternative 6 would remove five "contributory buildings," but in fact it would take out only three such structures. (Again, the KCR and Money Back Smith Buildings are just contingency contributors.) And the allegation that Alternative 6 would leave only 24 of the original "contributors" west of Broadway/Telegraph seems to understate by at least two the number of contributors that it would actually leave.

Regarding Alternative 3, page 289 specifically lists three contributors that it would demolish but fails to mention that it would also remove the contributory M. Stulsaft Building.

Ratings of the Pardee Building

I question the relatively low significance rating of "C" which the Draft EIR/EIS says was assigned to the Pardee Building by the Oakland Cultural Heritage Survey. What were the bases for that rating? There seems to be no obvious reason why the Pardee got only a "C" grade whereas, for example, the Woodward Building and the Hotel Touraine were rated "B." Were the Pardee Building's historical associations adequately considered? Its occupancy by several noted painters such as Richard Diebenkorn seems pertinent in this respect. Its connection with Governor Pardee may also be relevant. Architecturally, the building is a good—and essentially unaltered—example of functionalist and unpretentious but well composed early-20th-Century commercial construction. Its stately horizontality provides an interesting foil for nearby taller buildings. And with its unusually great total length of frontage, and abutting as it does no less than four streets, the Pardee Building plays a key role in maintaining the continuity of historic streetscape. Its significance rating should immediately be considered for upgrading, and the result should be reflected in the Final EIR/EIS.

At the same time and for similar reasons, the City should consider removing the "D" ("as part of district only") portion of the Pardee Building's rating as to apparent eligibility for National Register listing.

Displacement and Relocation of Artists and Booksellers

The Draft EIR/EIS says that the project's displacement of existing land uses in general ("Impact LAND-2") "would not be a significant impact," but that conclusion seems debatable. The impact could be very substantial from the viewpoint of displacees—particularly the longtime cluster of artists and antiquarian or used bookstores now accommodated by the Pardee Building.

This special cluster represents a type of cultural and economic resource that the City should be carefully nurturing, for its own value and in order to improve the general image and vitality of downtown Oakland. Yet here the City's "preferred" Alternative 1 would displace the artists and booksellers from their accustomed home—and the Draft EIR/EIS doesn't seem to give enough assurance that they could find a comparable substitute.

The discussion of "Mitigation Measure LAND-2" on pages 278-279 says that "Existing retail businesses in the Pardee building could [emphasis added] be permitted to return to the ground-floor retail space that would be included in the project; the City would assist those businesses in temporarily relocating during project construction." But even assuming that the City would let them rent ground-level space in the new City Administration Building, where

would the presently clustered booksellers relocate to for the lengthy construction period? Would they have to go to scattered interim sites, or could some single nearby location be found so as to conserve economic linkages and patronage? And after the construction period would the City, as landlord of the new building's ground-floor space, charge rents that the booksellers could actually afford?

Page 278 states that "some artists' studios currently located in the Pardee Building would be relocated," but the Draft EIR/EIS apparently says nothing about where they might go. I gather that there's been some talk about relocating them to upper floors of the Plaza Building. However, that office building's suitability for artists' studios seems questionable. And even if space there were suitable, would it be made available at a rent attractive to the artists?

I fear that unless stronger or more specific mitigation measures are taken than the Draft EIR/EIS exhibits, displacement from the Pardee Building would permanently shatter the unique but potentially fragile community of artists and booksellers. Artists might move to places like Emeryville, and booksellers might simply go out of business. And thus could downtown Oakland lose still more of its lifeblood.

Needed Building Size in General

It's obviously very desirable to achieve cost efficiencies, in both construction of the City Administration Building and in future operations and maintenance. However, it's important to have some reasonably demonstrated general idea of how much difference there would be in this regard between the various project alternatives. Unfortunately, the Draft EIR/EIS doesn't say much about this, and relies largely on brief conclusionary statements such as those on page 4 about size of floor plates.

It's also of course important to consider construction and operational costs in light of other relevant concerns such as historic preservation and visual character. For example, the City's "preferred" Alternative 1 would clear most of two blocks, destroying four contributory buildings and two contingency contributors, and erect vastly bulkier new structures. In order to significantly lessen drastic impacts like that, it would seem well worthwhile to accept some cost inefficiencies.

Actually, the floor plates provided by environmentally superior Alternatives 4, 5, and 6 would seem to be fairly large. For example, the draft's Figures 2, 70, and 87 appear to show that, under Alternative 6, the typical size of floor plates in the new City office structure on the Clay Street Garage site would roughly equal what's typical within each of the tower portions of the new Federal Building. (It would also seem to equal or exceed typical plate sizes in the APL and Clorox Buildings.) If that's good enough for Federal offices, why isn't it for City ones? Although options such as Alternative 6 might not yield floor plates of optimally efficient size, I suspect that the results would be practicable enough. And the smaller, less factorylike floors might well be more enjoyable for employees, and for the visiting public.

Regarding the aim of minimizing the number of departments that would be split between floors, there might be no difference at all between Alternatives 1 and 4. Alternatives 5 and 6 presumably would result in several more splits than Alternative 1 would. But would it really be a great problem for a department to be located partly on one floor and partly on a floor immediately

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above or below? In such a department some people would need to go one flight (or elevator stop) up or down in order, for example, to attend a staff meeting or use a departmental library. But that hardly seems terribly burdensome. And potential difficulties could be reduced by using proper forethought in the placement of interconnecting stairs or elevators.

The Draft EIR/EIS says that one reason why Alternative 6 is "not preferred" is that, "with three separate sites," it would entail duplication of administrative and support facilities such as conference rooms and building systems such as heating. However, there would seem to be ways to reduce the duplication. Couldn't the heating or other systems of Alternative 6's garage-site and Dalsiel-block buildings be integrated by means of connections under 15th Street? And couldn't movement of people between those two buildings be served by a corridor beneath 15th, in addition to the skywalk that the draft shows going over the street?

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Furthermore (and as I remarked in my earlier letter), Alternative 6 may offer the operational advantage of direct functional integration with the City Hall itself. For example, couldn't there be unobtrusive connecting corridors that would pierce the blank west wall of the City Hall and extend into the latter's first and/or second stories, beneath the Council Chamber? If this were done, then Alternative 6 would permit continuous indoor, all-weather pedestrian movement between—in total—more City office space than any other alternative.

The "One-Stop" Center

I strongly question the Draft EIR/EIS's statements (1) that Alternatives 5 and 6 would "preclude" creation of the desired "'one-stop' center for planning and building services" and (2) that such a center "would require a floor plate that could provide 30,000 to 40,000 net square feet."

Especially because I presume that the one-stop center would be largely for convenient interface with people seeking specific project approvals such as building permits or conditional use permits, I can't see why the concept would necessitate placing all 200 or so employees of the Office of Planning and Building Services on a single floor. I would think that most people seeking specific permits rarely, if ever, need to consult directly with that Office's long-range planners or researchers. Thus little would be lost by stationing the long-range planners and researchers on a separate floor that would, though, be right above or below the one where permit applications would be filed. And even regarding the Office's organizational units that actually process the applications, couldn't some distinction be made between (1) the "permit counter" areas and personnel having constant public contact and (2) the backup or "back room" functions? As an example of the latter, rooms for engineers doing elaborate types of plan-checking might be located on the next higher or lower floor, yet close to a connecting staircase. So might things like storage areas. If enough arrangements like these were made, the one-stop center could well be achievable with floor plates as small as about 20,000 net square feet.

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If so, then apparently Alternative 6 could house the center in either its garage-site building or its Dalsiel-block building—and either Alternative 5 or Alternative 6 could accommodate it on the Taldan block, which in some respects would be a more convenient location for visitors.

But even if the one-stop center would really have to have 30,000 to 40,000 net square feet all on a single level, it might well be possible to provide that in one of these ways:

1. Under Alternative 6, the center could in effect straddle the proposed pedestrian bridge across 15th Street. In other words, it could be partly in the building on the Clay Street Garage site and partly in the one on the Dalziel block but all on the same level as, and directly adjoining, the bridge. Windows and other features could be designed to help provide visual continuity between the permit counters, or other public-contact areas, at either end of the skyway. Rather than being an inconvenience, the short and quite scenic walk across the bridge would put some welcome enjoyment into the often-tedious permit process. And the permit center would certainly have a distinctive location ("it's up there right around the bridge").
2. Under a modified version of Alternative 6, the center might be at basement level with some of it being in the garage-site and Dalziel-block buildings and some of it beneath intervening 15th Street, thus attaining full physical continuity. (To allow this, the off-street parking which the Draft EIR/EIS indicates for Alternative 6 would likely need to be arranged differently within the overall site.) Because it seems that only a few motor vehicles would be allowed along this segment of 15th, parts of the right-of-way's present cross section might be made into planted light wells to help illuminate—and supply needed amenity to—the basement office space. Further relief could be provided by light wells located elsewhere and/or by clerestory windows.
3. Conceivably, under a modified version of either Alternative 5 or 6, the one-stop center might be at basement level with part of it being in the Taldan-block building and the rest of it extending out under the adjacent section of expanded City Hall Plaza. Illumination and amenity for the basement space could be furnished by light wells or other sunken areas that would be artfully integrated into the plaza's overall design.

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Sincerely,

JOHN S. ENGLISH

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copies mailed to:
Ezra Rapport, Deputy
City Manager
Jack Young, Project
Manager

Letter O (John English)

- 1) The CEQA Guidelines (Sec. 15126(d)(4), as amended, July 8, 1994), states that an EIR shall identify "an environmentally superior alternative" in addition to the no project alternative, if the no project alternative is the environmentally superior alternative. There is no requirement to "rank" alternatives. For information, in regard to historic buildings, Impact HIST-1, pp. 281-283 of the Draft EIR/EIS, identifies the buildings that would be demolished with each "build" alternative. Regarding Alternative 6 and retention of a portion of the Dalziel Building, please see the response to Comment J-1, p. 110 of this Final EIR Addendum.
- 2) The commenter is correct. Please see Chapter II.B, Addenda to the Draft EIR/EIS, for corrections to p. 289, p. 291, p. 292, and p. 293 of the Draft EIR/EIS. The changes do not affect the conclusions of Impact HIST-5. (The discussion at Impact HIST-1, pp. 281-283, correctly identifies the number of contributory buildings that would be demolished with each "build" alternative.)
- 3) As stated on p. 101 of the Draft EIR/EIS, and noted by the commenter, the ratings and district eligibility of buildings in the project area vicinity were determined by the Oakland Cultural Heritage Survey, a project of the City Planning Department. The commenter is referred to the 1985 Downtown District survey for additional information.
- 4) Please see the response to Comment C-1, p. 60 of this Final EIR Addendum.
- 5) As stated in the response to Comment C-1, p. 60, the Draft EIR/EIS analyzes environmental effects of the project alternatives, but does not analyze operational differences between alternatives. That comparison was included in the review of various alternatives conducted by the Advisory Committee, made up of Oakland citizens and City staff, during 1992. City staff and consultants have continued to evaluate operational characteristics of various alternatives (including the revised "Existing Buildings on Taldan and Dalziel Blocks Alternative" analyzed in this Final EIR Addendum; see the response to Comment A-1, p. 49 of this Final EIR Addendum). The City Council, as the City decision-making body, will have the responsibility for comparing alternatives both on environmental and operational grounds and selecting one alternative (including, potentially, the No-Project Alternative) for approval. Regarding a physical connection to City Hall, please see the response to Comment J-8, p. 113.

VI. Supplemental Comments and Responses

- 6) Please see the response to Comment E-6, p. 74 of this Final EIR Addendum.

VII. APPENDIX

**OAKLAND CITY ADMINISTRATION BUILDINGS
EXTERIOR DESIGN GUIDELINES FOR NEW BUILDINGS
IN HISTORIC DOWNTOWN DISTRICT**

JULY 11, 1994

Architectural Character of the Historic District

The sites currently being proposed for future city administration buildings are within the Downtown Historic District. As such any new construction should respect the existing historic buildings and enhance the general character of the area. This character has been evaluated by the staff and consultants of the Oakland Cultural Heritage Survey and is presented in the Historic Resources Inventory Form for the Oakland Downtown Historic District (State of California, Department of Parks and Recreation, August 31, 1984). Excerpts from the inventory follow:

"The great majority of contributing buildings date from 1904 to 1928 and display a general unity of style: attached at ground floor level with no set backs, brick and masonry surfaces, 2 or 3 part vertical composition, Beaux Arts-derived ornament, projecting terra cotta or metal cornices, frequently skeletal articulation and Chicago-style window treatment."

"Variations within the prevailing 1906-1920s historicist style of the district include brick or reinforced concrete construction; varying proportions of stone, brick, and terra cotta surfacing; and the contrast between 3-part skyscraper composition and smaller, loft buildings with high glass base and brick or terra cotta top. Cornices come in wide, flat, neo-classical modillion style as well as narrower, corbelled version."

"The scale of the district is urban but not massive: buildings were designed to be solidly attached.... The mass of almost all the buildings is further broken up by their ornamentation and the contrasting registers of their 3-part and glass base designs."

General Guidelines for New Buildings

New construction in the historic district should follow the Secretary of the Interior's Standards for Rehabilitation, especially:

3. *Each property shall be recognized as a physical record of its time, place, and use. changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.*
9. *New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be*

compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

10. *New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

Site-Specific Guidelines for New Buildings

New additions, exterior alterations, or new construction should also follow these site-specific design guidelines:

1. Observation: City Hall is different from the commercial buildings. It is set back from the sidewalk and was designed as a free standing, rather than in-fill, structure. The surrounding buildings in the historic district do not share these traits.

Guideline: The proposed City Administration building represents a change in the use of these two blocks, from retail/office to civic. New buildings should respond to the smaller scale existing commercial character, rather than emphasizing the generally larger, more monumental character of civic buildings.

New construction should respect and reinforce the character of the district, but should not duplicate the exact form, style, and detailing of the existing district buildings. The new building should be distinguishable from the historic structures, while sympathetic to them.

2. Observation: Existing buildings are built to the lot lines and are flush to the sidewalk. Existing buildings maintain a similar plane along the street facades. They are not set back nor are there many visible recessed spaces, lightwells, or cut outs along the street facade. The heights of the buildings vary from one story to eight stories.

Guideline: The primary facade facing the street should be at the sidewalk, not set back, barring other unforeseen requirements. This is especially important along the primary streetfronts on Broadway, San Pablo Ave., Washington Street, and 15th Street. The streetfront facade should be in the same plane as adjacent buildings, and should respect adjacent facades and facades across the street.

A new addition to an existing building should be compatible in mass, materials, relationship of solids to voids, and color, but clearly differentiated as new construction. The joint between a new addition should be detailed to clearly distinguish the new from the existing.

3. Observation: Existing district buildings were constructed during an earlier age and represent a type of construction characterized by highly crafted street facades and articulated detailing.

Guideline: New district buildings should respond to this craftsmanship. Regardless of the materials used, they should showcase the best of current building craft and be constructed with the highest level of craftsmanship available.

4. Observation: Bridges or skyways over streets are not characteristic of the district.

Guideline: Avoid the use of bridges or skyways if possible. If a bridge must be used, it should be designed to be as light and transparent as possible.

5. Observation: The ratio of solid to void varies from solid walls punctured by window openings to more transparent facades with Chicago-style window treatment characterized not only by a high ratio of glazing, but also by an emphasis on the supporting members of the window wall. The rhythm of fenestration is a prominent characteristic.

Guideline: The streetfront facade could be articulated/modulated, but should not have any major recessions or light wells visible from the street. Streetfront walls above the first floor should be solid with pierced openings, as opposed to glazed curtain walls. The windows of new buildings should respond to the proportions of windows in nearby historic buildings.

6. Observation: Most of the buildings have a vertical hierarchy with base, middle, and top. The base is often defined by a two-part composition defined by a ground level storefront with a mezzanine above. The mezzanine is usually articulated in a manner different from the storefront. The top level or levels of most buildings are differentiated by an architectural treatment that is different from the base or middle, and have a distinguishing cornice. Older existing buildings of different ages nonetheless show consistent alignment of roof, cornice, belt cornices, and window lines.

Guideline: The facade should respond to the three-part composition of surrounding district buildings. Ground floor commercial space should be transparent so people can see into the building. It should respond to the composition of surrounding district buildings, which generally have a storefront at ground level and a mezzanine above. The top levels of the facade should have a distinctive cornice and an architectural treatment different from the base and middle section. Align roof, cornice, belt cornice and window lines with adjoining historic structures wherever possible.

7. Observation: There are generally retail shops at the ground level. Retail shop entrances are usually recessed into the building and are often identified by canopies over the sidewalk. Architectural treatment varies from the understated to grand arched entrances.

Guideline: Retail entrances should be obvious and identifiable but not overwhelming. A recessed retail entrance space is acceptable. Canopies are acceptable. Distinguish between main entries for City offices and retail entrances.

8. Observation: The color of materials are the natural color of brick or stone; the color of terra cotta tends to tan, gray, or neutral colors. Red brick is uncommon; tan and whitish brick are more common. Ornamental features and details have brighter, more primary colors for accent. Glazed terra cotta is a signature material in the downtown district.

Guideline: The color of the building should be neutral, or the natural color of brick and stone materials. Brighter, polychrome accent colors are acceptable as part of decorative details or features. Consider the use of glazed terra cotta for exterior finishes.

9. Observation: The Downtown district has been characterized as having prominent corner buildings with low-rise infill in the center of the block. The prominence of these corner buildings would be lost if adjacent new buildings are massed so they overwhelm the corner buildings.

Guideline: Mass new buildings to maintain the prominence of the corner buildings.

10. Guideline: Consider the appearance of new buildings from City Hall Plaza and the impact of buildings on the Plaza. Locate building entries to enhance circulation through the Plaza.

City Administration Building Project

Design/Build Program Development

by the Ad Hoc Staff Committee

for the

City Hall Plaza Redesign

COMMITTEE RECOMMENDATIONS

TRAFFIC/CIRCULATION

1. Close 15th St. east of Clay St. and San Pablo south of 15th St.: Discontinue traffic and parking in front of City Hall (along City Hall Plaza) and along San Pablo Avenue from City Hall Plaza/San Pablo intersection southward and discontinue traffic along 15th St. between Clay and San Pablo Avenue. Limited parking should be allowed along 15th St. for Council and Mayoral parking. Freight traffic for the Taldan block, and possibly the City Hall Plaza Building, should be directed underground by 2-way ramp starting south of 16th St.

2a. Light rail to be encouraged to serve the Plaza: Light rail plans should include a station near the Plaza along Broadway or 14th Street (Broadway preferred) rather than entering the Plaza. Should no feasible scheme exist other than light rail entering the Plaza, close and careful coordination between the station designers and the City must occur. Any design for a station in the Plaza must consider schemes which do not threaten or endanger pedestrian traffic in the Plaza and does not cut off one side of the Plaza from the other. This will require the station to not be elevated and not physically isolated from the rest of the Plaza area.

3. Daziel site parking should not ingress or egress along 15th St. or Washington St.: 15th St. and Washington St. along the Plaza should become pedestrian ways and only emergency vehicles or limited service vehicles allowed to enter.

4. Freight/Deliveries for buildings only accessible from the pedestrian way to be served underground: To prevent heavy delivery traffic along 15th Street, only City Hall should be served 15th Street. City Hall Plaza Bldg. and the bookstores should be served from San Pablo Avenue.

5. Pedestrian drop-off: Only 14th Street should be used for pedestrian drop-off. Parking should be disallowed along 14th Street from Broadway to Clay. The

Parking should be disallowed along 14th Street from Broadway to Clay. The entire curb should be given to buses (from Broadway) and pedestrian drop-off.

SURVEILLANCE

1. **Lighting must eliminate all dark spots over the entire Plaza at night:** As a crime prevention measure and personal safety, lighting should be sufficient to assure no dark areas at night. It is not necessary, nor may it be desirable, to require intense brightness over the entire Plaza. Simply eliminate shadow areas.
2. **Maintain unrestricted sight lines:** As a crime prevention measure, assure long sight lines over all areas of the Plaza. Allow no walls, large bushes, or similar visual obstructions which could hide a person. Limit all grade offsets to 3 ft. or less.

LIMITS OF THE PLAZA AREA

1. **Extend Plaza park from building to building:** The Plaza should be considered to extend continuous to the sidewalk of the buildings fronting onto the Plaza. Existing curb depressions for roadways should be removed or modified to visually continue the plaza over existing roads.
2. **Kahn Alley should become an extension of the Plaza:** Except for over-projecting portions of upper stories of any structures built adjacent to Kahn Alley (15th St. between San Pablo and Broadway), Kahn Alley should be widened sufficient to visually attract pedestrians to the Plaza from Broadway. The Broadway portal to Kahn Alley should remain strictly a pedestrian way and clearly be an extension of the Plaza to Broadway.
3. **15th St. at City Hall should become a pedestrian way:** The area along 15th St. should be designed as an extension of the Plaza with due consideration for high pedestrian traffic and emergency vehicular traffic.
4. **Extend Plaza northward to 16th St.:** The northmost terminus of the Plaza should be the south side of 16th St. The existing vehicular traffic must continue to the end of Washington St. for access and service to buildings along San Pablo Ave. and street access to the front of the Rotunda Building.

PRESERVATION ISSUES

1. **Only the Plaza center oak tree to be a required vegetation preservation:** No restrictions should exist on any existing plant life except the center oak tree. If the oak tree is preserved, the designers must consider the effect the absence of the oak tree, from sickness or lightening for example, would have on the

Plaza design. No design should consider it feasible to move the existing oak tree; however, the london plane trees can be considered salvageable.

2. Preservation of Existing Improvements: The designer is encouraged to remove from the existing Plaza any construction or improvement he believes inappropriate or not compatible with his design. The City should take responsibility for relocating any existing monuments, memorials, etc., that it wishes to retain.

URBAN DESIGN

1. The Plaza's Concept: The new Plaza should reinforce the concept of the area as a center of civic activity utilizing its enclosing buildings, street areas and open space to create an identifiable place or civic center. The design should accommodate a variety of spaces along the perimeter of the Plaza, i.e., sidewalk cafes along San Pablo Avenue, street vendors, bus stops- as examples.

2. Relation to Neighboring Buildings and Open Areas: The Plaza should respect the relationship of neighboring buildings and their entrances. The design should recognize the radial street pattern established along the San Pablo Avenue axis. The 14th Street edge should be well defined but yet accessible and inviting to traversing pedestrians. Pedestrian flows to and from adjacent outdoor areas, such as City Center, the Federal and State office building sites, and Broadway, should be recognized and encouraged.

3. Visual Connections: The design of the Plaza should highlight the visual axes towards City Hall from 14th and Broadway, City Center Plaza, San Pablo Avenue and from Kahn Alley.

LANDSCAPING

1. Use of Vegetation: Preference should be given to native, drought-resistive vegetation. Perennials should be utilized for displays of color. Planted areas should be minimized and no more than one-third the plaza area.

2. Use of Planters: Large planter boxes in hardscape areas, which can double as seating areas, are preferred means of provision for shrubbery and trees in the Plaza areas. High vegetation should not exist in such closeness or quantity as to block wide areas of views across the Plaza.

3. Landscaping Maintenance: Landscape vegetation must be easy and economical to maintain.

4. Plant Selection: Provide plant selections which provide seasonal and textural interest.

5. The Oak Tree: The design plan must reinforce the existence of the Oak Tree. The construction in proximity of the Tree should reflect the treatment and conditions required to sustain the life and welfare of the Oak Tree.

PARK DESIGN DETAILS AND MATERIALS

1. Pedestrian Patterns: The Plaza design should provide efficient pedestrian connections between buildings adjoining the open Plaza space and it should accommodate pedestrian patterns from future developments in the area.

2. Terminal Junctures: The Plaza should meet building perimeters without impediments such as curbs or physical barriers. Along 14th Street, the Plaza should be at the same level as the sidewalk.

3. Entrance Accents: Provide significant architectural elements; i.e., an arch, obelisk, columns, or similar; to accentuate the north, northwest, east and/or southeast entrances to the Plaza and thereby contain the plaza.

4. Hardscape Materials: Plaza paving should contrast with the buildings enveloping the Plaza space. No exposed aggregate paving should be used in the Plaza.

5. Character of Elements: Elements used in the design of the Plaza should respond to the architectural character of the Rotunda, City Hall, and Broadway Plaza Buildings in terms of historic reference, detail, size, color, and massing. Light fixtures should reflect the historical period of the surrounding buildings or be sympathetic to the character of the period.

6. Character of Plaza: The overall design of the Plaza should be symbolic and make allusions to either Oakland's history or refer to its geographic and economic role in the Bay Area.

7. Plaza Relation to City Hall: City Hall should remain the dominant building in and adjacent to the Plaza. The Plaza's design should reflect this dominance. The Plaza design must coordinate with the City Hall entrance design.

8. Maintenance Routes: Provide access ways for maintenance vehicles throughout the Plaza for required servicing; i.e., collecting refuse, changing light fixture bulbs, distributing and collecting portable furniture and fixtures, etc. maintenance access ways should be integrated with pathways and walks and not appear to be an intrusion on the park design.

9. Utility Routes: Route underground utility services for ease of access. Servicing underground utilities must not require damaging and replacing expensive surfacing or be located under objects causing difficulty to access.

10. Elements Which Must Be Provided: The plaza design must indicate, by detailed appearance and suggested locations, the following elements:

Seasonal Banner Poles: Provide for seasonal banners to celebrate special occasions, announce important events and provide color and spectacle to the Plaza.

Directional Signage: Provide permanent directional signage giving direction information to all buildings, City government organizations and major businesses facing onto the Plaza. Indicate proposed lettering style and design detail.

Sitting Provisions: Provide fixed provisions for seating to accommodate the various functions identified below. Provisions for sitting should integrate into the provision of other Plaza design elements, such as planter boxes, fountains, etc., and not stand alone as isolated benches. Wood should not be used to provide seating.

Refuse Containers: Provide a design or available production selection for compatible, fixed, permanent refuse containers. Containers should encourage recycling and provide ease of access for collections but discourage random accessing and spillage of refuse onto the Plaza paving and landscaping.

11. Elements to Consider: As determined appropriate by the design/builder, suggest designs for other elements which are likely to influence the appearance of the Plaza, such as:

- Bus stops
- Newspaper vendors
- Flower vendors
- Informational kiosks, to name a few.

PLAZA FUNCTIONS

1. General: The Plaza design must indicate how areas can be used for accommodating the various functions indicated below. Areas for activities anticipating large crowds must allow full utilization during periods when the activity is dormant and always integrate with the Plaza design. The designer must designate service outlet locations for services required by the activity, i.e., power for public speakers, water, special lighting, or similar.

2. **Day Concerts:** An area should be designated for provision of concerts for workers and interested public during the workday or weekends.
3. **City Hall Rallies:** Designate provisions for public ceremonies and rallies in the front of City Hall's main entrance.
4. **Public Entertainment:** Provide an area which could be used for installation of a portable outdoor ice-skating rink during evenings and weekends. Additional alternative public activities may also be suggested.
5. **Public Sitting:** Provide seating areas for citizens who wish to sit in the Plaza and observe. Also provide sitting accommodations which encourage eating brownbag lunches and casual conversations.
6. **Outdoor Cafes:** Provide paving and drainage, area definition (i.e., low removable fences, rope stanchion system, etc.) and landscape buffers or similar sufficient to encourage establishment of outdoor eating areas along the San Pablo Avenue side of the Plaza.

SERVICE INFRASTRUCTURE

1. **Service Water:** Provide service water outlets for maintenance workers at spacing no greater than 100 ft. center-to-center on service bollards and/or flush boxes set near the edges of paved areas. No drinking fountains are recommended. Avoid installation of underground piping under extensively paved areas.
2. **Electrical Power Outlets:** Electrical power outlets should be provided only where required by a Plaza function. All such outlets must be key-accessed and mounted on a service bollard or in flush box in a permanent, fixed surface. Avoid installation of underground electrical conduits under extensively paved areas.
3. **Irrigation Water:** Provide automatically controlled irrigation piping to fixed planters when so servicing will not require subgrade piping under large expanses of paved areas. Provide automatically controlled irrigation piping to all lawn areas. Avoid installation of underground piping under extensively paved areas.



Federal Emergency Management Agency

Region IX
Building 105
Presidio of San Francisco
San Francisco, California 94129

OCT 13 1994

Ms. Claudia Nissley
Director, Western Office of Project Review
Advisory Council on Historic Preservation
730 Simms Street, #401
Golden, Colorado 80401

Attention: Lee Keatinge

Dear Ms. Nissley:

Subject: Oakland City Hall Annex, 1417 Clay Street, Oakland
FEMA-0845-DR, P.A. 001-91008
Subgrantee: Oakland Redevelopment Agency

At the end of June 1994 we sent you a letter regarding the Draft EIR/EIS prepared by Environmental Science Associates (ESA) for the Oakland City Hall Annex (Administration Building). We were anticipating that this document would form the basis for the required Section 106 review for this project.

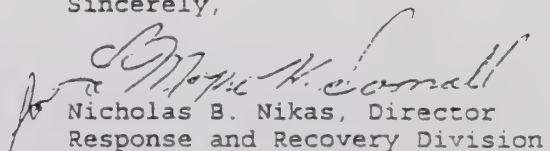
We pursued this direction on the belief that the new Administration Building was at least a partially funded Federal Undertaking based on the erroneous assumption that the Subgrantee intended to apply the eligible costs for the repairs of the original Annex to the new Administration Building. After a review of our files revealed that the Subgrantee never made such an application we necessarily had to limit our scope to the only Federal Undertaking that exists which is the Repair/Replacement of the original City Hall Annex at 1417 Clay Street.

Therefore, the Federal Emergency Management Agency (FEMA) has no responsibilities for compliance with the National Environmental Policy Act (NEPA) or Section 106 of the National Historic Preservation Act for the new Administration Building presently being developed by the Redevelopment Agency and the City of Oakland.

However, FEMA still has a responsibility for the effects of any future development on the original site because of its location in a National Register Historic District. After we have clarified with the Subgrantee what their plans are for this site we will again contact the consulting parties to review the best course of action to take at that time. Also, at that time we will recirculate a revised version of the Memorandum of Agreement (MOA) previously sent to you on May 5, 1994 dealing with the original site.

If you have any questions regarding this matter please contact Sandro Amaglio at (415) 923-7284.

Sincerely,


Nicholas B. Nikas, Director
Response and Recovery Division

cc: Cherilyn Widell, SHPO
Nancy Ward, GAR
Ezra Rapport, City of Oakland
Anu Raud, City of Oakland
Helaine Kaplan Prentice, Landmarks Preservation Advisory Board
Carolyn Douthat, Oakland Heritage Alliance
Alan Dreyfuss, Oakland Heritage Alliance

CITY OF OAKLAND



CITY HALL • ONE CITY HALL PLAZA • OAKLAND, CALIFORNIA 94612

Office of City Manager
Craig G. Kocian
City Manager

(510) 238-3301
TTY/TDD (510) 238-3724

November 2, 1994

Dear Interested Party:

As you know, the City of Oakland needs to develop new administrative office space to replace that lost as a result of the October 1989 Loma Prieta earthquake. Furthermore, the historic City Hall, also damaged in the earthquake, has been undergoing seismic upgrading and renovation. As a result, the City has been forced to lease office space in a variety of locations, both downtown and elsewhere.

The City, in cooperation with the Federal Emergency Management Agency (FEMA), prepared a draft Environmental Impact Report and Environmental Impact Statement (Draft EIR/EIS) which analyzed six alternative projects (and a No Project alternative) to house City government offices. The Draft EIR/EIS was released for a 45-day public review period on July 8, 1994. The City received eight written comments, and oral comments from three Planning Commissioners and seven members of the public. The comment period closed on August 29, 1994.

The Draft EIR/EIS was published in compliance with both CEQA, the California Environmental Quality Act, and National Environmental Policy Act (NEPA). However, the Federal Emergency Management Agency (FEMA) on October 13, 1994 informed the City that the scope of the Federal Undertaking is limited to the Repair/Replacement of the original City Hall Annex at 1417 Clay Street. Therefore, FEMA has no responsibilities for compliance with either NEPA or Section 106 of the National Historic Preservation Act with respect to the new Administration Building presently being developed by the City and Redevelopment Agency on other sites surrounding City Hall Plaza.

The City has decided, as a courtesy to those members of the public who had anticipated a Section 106 consultation process, to provide an additional 15-day comment period for which to comment on the Draft EIR/EIS. Comments received by 5:00 PM on Friday, November 18, 1994 will be addressed in the Final Addendum to the EIR (Response to Comments), as will all the comments received prior to the previous deadline.

The City of Oakland is committed to allowing the public every opportunity to comment on the adequacy of the environmental impact report. We look forward to your remarks.

Sincerely,

Ezra Rapport
Deputy City Manager

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